

TSD File Inventory Index

Date: February 12, 2004

Initial: CMHewes

Facility Name <u>Acme Finishing Company, Inc. (One Teller Site)</u>			
Facility Identification Number <u>11D005087812</u>			
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Total - 1

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Note Transmittal Letter to Be Included with Reports.

Comments

Documents do not justify individual fields per schedule.

A.2 Part A/Interim
Status



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD005087812

REACKNOWLEDGEMENT

ACME FINISHING COMPANY INC

1595 OAKTON

ELK GROVE VILLAGE

IL 60007

INSTALLATION ADDRESS

1595 OAKTON

ELK GROVE VILLAGE

IL 60007

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 F003 23 - 26	3 F005 23 - 26	4 F017 23 - 26	5 F018 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Dennis W. Walters

NAME & OFFICIAL TITLE (type or print)

DENNIS W. WALTERS VICE-PRES.

DATE SIGNED

9-26-80



finishing co., inc.

V7

1595 oakton,

elk grove village, illinois 60007,

312-640-7890

November 9, 1983

RECEIVED

NOV 15 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

RCRA Activities
Region V
P.O. Box A 3587
Chicago, Ill 60690-3587

ILD 105 087 812 PA, 6, TSD - NRS 9

RE: Insufficient Information Response To
our Permit Application Withdrawl Letter
Facility: Acme Finishing Co., Inc.
U.S.E. PA I.D. No: ILD 005 087 812

Gentlemen:

This is to acknowledge receipt of your letter of October 13, 1983 informing us that our Permit Application Withdrawl Letter did not contain sufficient information.

We are currently filing a closure plan with the Illinois EPA and as soon as we have an approved plan, I will forward it to your office.

Very truly yours

ACME FINISHING CO., INC.

Dennis Walters

DW/vm

RECEIVED
11/15/83

Part A Review - Qualification for Interim Status

I. General Information

Facility Name Acme Finishing Co Inc

ID# 1LD00508781Z

Reviewer Grigolauski

Review Completion due date Dec 1 1981

Date of submission of notification 9-26-80

deadline date 8-18-80

Date of submission of Part A 11-17-80

deadline date 11-19-80

Was the facility in existence before November 19, 1980 _____

☐ Core Items missing

☐ Non Core Item Missing

II. Facility Description

A. Type of Facility:

☒ on-site

☐ off-site

B. Classification

☒ Late Notification only

☐ Late Part A only

☐ Late Part A and Late Notification

☐ Non-Notifier

☐ Non-Notifier and Late Part A

C. Action

☐ Qualifies for Interim Status

☒ Refer to Enforcement

☐ Non-regulated, explain _____

III. Facility History

A.* The circumstances surrounding the failure of the owner or operator to:

1. notify or notify on time

- ☐ a. not aware that waste was hazardous
- ☐ b. test results came back late
- ☐ c. at first thought the waste was non-hazardous later results said it was hazardous
- ☐ d. could not understand regulations
- ☐ e. lost in mail
- ☐ f. small quantity generator that lost his/her exemption due to increase in waste quantity
- ☐ g. did not think it was required if Part A sent in
- ☐ h. underwent change in ownership.
- ☐ i. change in regulations
- ☒ j. Other UNKNOWN

☐ k. Comments

2. submit Part A on time.

- ☐ a. could not understand regulations

* Complete this part by checking the written file information only-
NO phone memos accepted.

- _____ b. expected to be able to store for less than 90 days but had problems disposing of wastes, and needed to store longer than 90 days
- _____ c. underwent a change in ownership
- _____ d. lost in the mail
- _____ e. contemplating closure of facility
- _____ f. had trouble filling out the form, or gathering the required information.
- _____ g. change in regulations
- _____ h. other _____
- _____
- _____
- _____
- _____
- _____
- _____
- _____ i. Comments _____
- _____
- _____
- _____
- _____
- _____

B. 1. Has there been an inspection of the facility by either State or Federal inspectors? Yes

date 1-29-81 Agency IEPA

2. If so, was the facility in compliance with 40 CFR Part 265 _____ (if no answer below).

- X a. the violations were administrative in nature
- _____ b. the violations were environmental in nature

3. a. List of violations: Refer to inspection report and compliance order.

b. - Comments: _____

(add additional pages if needed)

4. Will the facility's continued operation be a benefit to the environment?

- ☐ a. it will help alleviate regional shortage of treatment, storage, or disposal capacity
- ☐ b. damage to the environment is negligible or non-existent
- ☐ c. it will not benefit the environment

d. other, explain: Not known

5. Did the facility gain unfair advantage over its competitors by its non-compliance? Unknown

IV. Recommendations on facility's status: Refer to
Enforcement for I.S. Compliance
Order.

ACME FINISHING COMPANY, INC.
1595 Oakton Street
Elk Grove Village, IL 60007

EPA I.D. NO.
ILD005087812



DRUM STORAGE AREA



TREATMENT TANKS
INSIDE PLANT



DRUM STORAGE
AREA

SOUTHWARD VIEW OF PLANT
AND STORAGE AREA



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

OCT 13 1983

REPLY TO ATTENTION OF:

5HW-13

Dennis Walters, Vice President
Acme Finishing Company, Incorporated
1595 Oakton
Elk Grove Village, Illinois 60007

RE: Permit Application Withdrawal Letter
(Insufficient Information)
FACILITY NAME: Acme Finishing Company Incorporated
U.S. EPA ID NO.: ILD 005 087 812

Dear Mr. Walters:

This is to acknowledge receipt of your letter of August 1, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request did not contain sufficient information to enable this office to concur with your determination. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265, Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

Please do not hesitate to contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter, (Insufficient Information)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

To Not. file



finishing co., inc.

1595 oakton,

elk grove village, illinois 60007.

312-640-7690

August 1, 1983

IL0005087812 G, T S O, P A

U.S. Environmental Protection Agency
Mail Code: 5HW-13
230 S. Dearborn
Chicago, Ill. 60604

NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF

DATE 8/15/83

Attn: Ms. Zetta Davis

Dear Ms. Davis:

Thank you for your informative instructions given to me in our phone conversation on July 28, 1983. As I stated at that time, our company applied for a permit as a hazardous waste storage site under RCRA because we mistakenly believed that waste haulers would maintain their policy of removing only large quantities of hazardous waste. Because we are as small generator, the time to accumulate these quantities of waste would be considerable. Now, under RCRA, they are willing to transport our hazardous wastes as frequently as is necessary to keep our accumulation time to under 90 days.

Consequently, we are requesting that you change our status to simply a hazardous waste generator because we are not a hazardous waste treatment, storage, or disposal site. Our hazardous waste materials are removed from our site in less than 90 days from the time of generation.

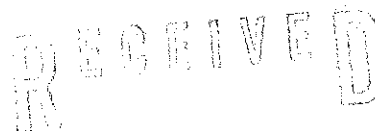
Your cooperation in implementing this change in our classification will be greatly appreciated.

Yours very truly,

ACME FINISHING CO., INC.

Dennis Walters

Copy: Mr. Andrew Vollmer, Ill. E.P.A.



NO ACTION TAKEN
PENDING DECISION ON WITHDRAWAL
BY EPA STAFF

FORM 1 GENERAL	 EPA	ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; display: inline-block;"> FLD005087812 </div>
II. POLLUTANT CHARACTERISTICS <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p> </div>			GENERAL INSTRUCTIONS <p>If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.</p>

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY	<div style="border: 1px solid black; padding: 2px;"> ACME FINISHING COMPANY INC </div>
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IV. FACILITY CONTACT	A. NAME & TITLE (last, first, & title) <div style="border: 1px solid black; padding: 2px;"> WALTERS DENNIS W VICE PRES </div>	B. PHONE (area code & no.) <div style="border: 1px solid black; padding: 2px;"> 312 640 7890 </div>
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V. FACILITY MAILING ADDRESS	<div style="border: 1px solid black; padding: 2px;"> A. STREET OR P.O. BOX 1595 OAKTON </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> B. CITY OR TOWN ELK GROVE VILLAGE </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> C. STATE IL </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> D. ZIP CODE 60007 </div>
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VI. FACILITY LOCATION	<div style="border: 1px solid black; padding: 2px;"> A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER 1595 OAKTON </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> B. COUNTY NAME COOK </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> C. CITY OR TOWN ELK GROVE VILLAGE </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> D. STATE IL </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> E. ZIP CODE 60007 </div> <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> F. COUNTY CODE (if known) </div>
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CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
7 3479 (specify) COATING SERVICE										7 (specify)									
C. THIRD										D. FOURTH									
7 (specify)										7 (specify)									

VIII. OPERATOR INFORMATION

A. NAME										B. Is the name listed in Item VIII-A also the owner?									
ACME FINISHING COMPANY INC										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO									

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box, if "Other", specify.)										D. PHONE (area code & no.)									
F = FEDERAL S = STATE P = PRIVATE M = PUBLIC (other than federal or state) O = OTHER (specify) P (specify)										312 640 7890									

E. STREET OR P.O. BOX									
1595 OAKTON									

F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
BELK GROVE VILLAGE										IL		60007		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										781217 (specify) ILL. EPA, HAZARDOUS WASTE									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R										791949 (specify) ILL. EPA, HAZARDOUS WASTE									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

WE PROVIDE A CUSTOM PAINT FINISHING SERVICE FOR MANUFACTURERS OF DIVERSIFIED METAL PRODUCTS.

WE ARE CURRENTLY IN THE PROCESS OF OBTAINING NECESSARY PERMITS FOR THE CONSTRUCTION OF A NEW FACILITY IN THE AREA OF BELK GROVE VILLAGE, ILLINOIS.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)										B. SIGNATURE										C. DATE SIGNED									
DENNIS W WALTERS, VICE-PRES.										Dennis W Walters										11-17-80									

COMMENTS FOR OFFICIAL USE ONLY

C									
15 16 17 18 19 20 21 22 23 24									

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	incinerator
X-2	D 0 0 2	400	P	T 0 3 D 8 0	landfill
X-3	D 0 0 1	100	P	T 0 3 D 8 0	landfill
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																									
WILDO05087812													DUP																									
DESCRIPTION OF HAZARDOUS WASTES (continued)																																						
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)	D. PROCESSES																														
								1. PROCESS CODES (enter)						2. PROCESS DESCRIPTION (if a code is not entered in D(1))																								
	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60
1	F	0	0	1			2	4	0					P	S	0	1																					
2	F	0	0	3			2	3	0	0	0			P	S	0	1																					
3	F	0	0	5																																		
4	F	0	1	7			3	4	0	0	0			P	S	0	1																					
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IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	0	5	0	8	7	8	1	2	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	0	1	0	1	8
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

0	8	7	5	7	0	4	2
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX												4. CITY OR TOWN												5. ST.				6. ZIP CODE			
F												G																			
15 16												45 15 16												40 41 42				47 51			

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

DENNIS W. WALTERS

B. SIGNATURE

Dennis W Walters

C. DATE SIGNED

11-17-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
W ILD005087812													W DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES												
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)			B. ESTIMATED ANNUAL QUANTITY OF WASTE			C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)									2. PROCESS DESCRIPTION (if a code is not entered in D(1))								
	23	24	25	26	27	28		29	30	31	32	33	34	35	36	37	38	39	40	41	42				
1	F001				2400		P	S01																	
2	F003				23000		P	S01																	
3	F005																				INCLUDED WITH ABOVE				
4	F017				34000		P	S01																	
5	F018				6000		P	T01S01																	
6																									
7																									
8																									
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IV. DESCRIPTION OF HAZARDOUS WASTE (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)															
S	F	I	L	D	0	0	5	0	8	7	8	1	2	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)										LONGITUDE (degrees, minutes, & seconds)									
4	2	0	1	0	1	8	0	8	7	5	7	0	4	2					
65	66	67	68	69	70	71	72	73	74	75	76	77	78	79					

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER										2. PHONE NO. (area code & no.)									
E										55 56 57 58 59 60 61 62 63 64 65									
3. STREET OR P.O. BOX										4. CITY OR TOWN									
F										G									
17 18 19 20 21 22 23 24 25 26 27										40 41 42 43 44 45 46 47 48 49 50									

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
DENNIS W. WALTERS	Dennis W Walters	11-17-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

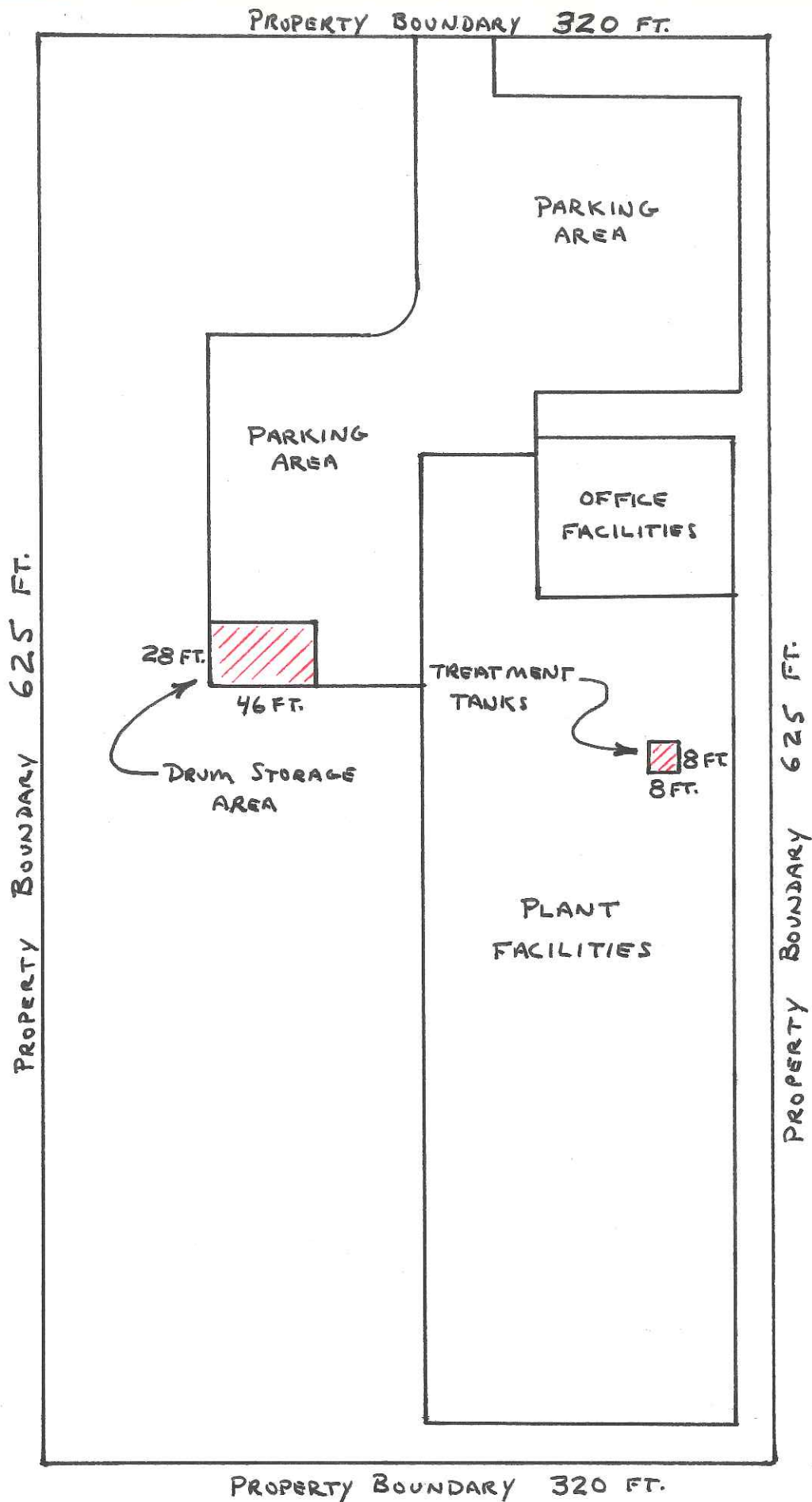
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

X. EXISTING ENVIRONMENTAL PERMITS (CONTINUED)

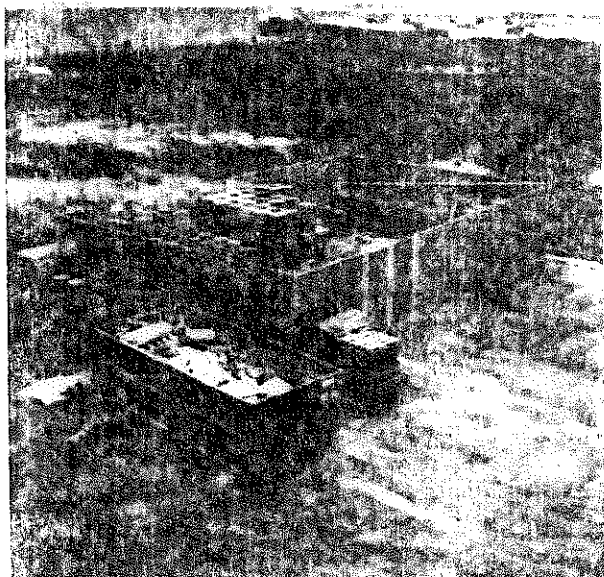
E. OTHER (CONTINUED)

998970 ILL. EPA, HAZARDOUS WASTE

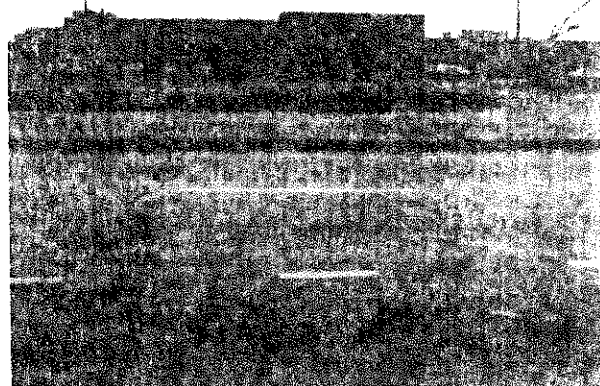
V. FACILITY DRAWING (see page 4)



SCALE:
 $\frac{3}{4}" = 50 \text{ FT.}$



DRUM STORAGE AREA



DRUM STORAGE
AREA

S. ... PLANT
AND STORAGE AREA

**A.4 Closure/Post
Closure**



217/782-6762

Refer to: 0314400002 -- Cook County
Elk Grove/ACME Finishing
ILD-005087812

December 7, 1984

Mr. Dennis Walters
ACME Finishing Company, Inc.
1595 Oakton
Elk Grove, Illinois 60007

Dear Mr. Walters:

The closure plans as prepared and submitted by Dennis Walters, dated December 15, 1983, and received by this Agency on December 20, 1983, and additional information received by the Agency on October 15, 1984, to close the hazardous waste storage area are hereby approved. The approval of these plans is further subject to the following modifications and conditions:

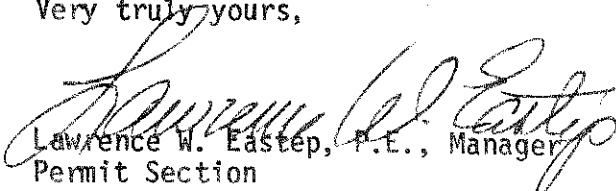
When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications must be received at this Agency within 30 days after closure.

All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

Should you have any questions concerning this matter, please contact Wally El-Beck at 217/785-4437.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:WKE:jk/2489d,16

cc: Northern Region
Division File
Financial Assurance Unit



finishing co., inc.

1595 oakton, elk grove village, illinois 60007,

312-640-7890

February 27, 1985

RECEIVED
MAR 1 1985

Lawrence W Eastep, P.E. Mgr.
Land Permit Section
Illinois Env. Prot. Agency
Div. of Land Pollution Control
2200 Churchill Road
Springfield, Ill 62706

WASTE MANAGEMENT
BRANCH

ILD005087812 G, TSD, PA-9

Dear Mr. Eastep:

This letter is our official closure certification from us as owners/operator and from an independent registered Professional Engineer for our RCRA storage facility ILD - 005087812 in Elk Grove Village, Cook County, Illinois. The facility will be maintained as a temporary hazardous waste/raw material storage area in the future.

I, Acme Finishing Company, of 1595 Oakton Street, Elk Grove Village, Illinois 60007, as owner and operator, hereby state that, to the best of my knowledge and belief, the above - named hazardous waste facility has been closed in accordance with the attached Illinois EPA approved closure plan and that the closure was completed on February 26, 1985.

Dennis Walters
Dennis Walters, Vice President

ACME FINISHING CO., INC.

February 27 1985
Date

I Dale Montgomery, as Illinois Registered Professional Engineer, hereby certify, to the best of my knowledge and belief, that I have made visual inspection of the aforementioned Acme Finishing Company facility and closure of the aforementioned facility has been performed in accordance with the closure plan for the facility approved by the Illinois E.P.A. (attached).

Dale Montgomery
Dale Montgomery
5527 W 25th St
Cicero, Ill 60650

2-27-85
Date

Dm
ILL. P.E. #62-34101

Sincerely

Dennis Walters, Vice President

cc: Karl Klepitsch, U.S.E.P.A. Region V

Dale Montgomery, P.E.
Encl: IL EPA Approved closure plan

RECEIVED

MAR 01 1985

WMD-RAIU
EPA, REGION V

CLOSURE PLAN

Name of Site: ACME FINISHING CO. INC.

Site Location: _____

Street, R.R. # or P.O. Box 1595 OAKTON

City ELK GROVE VILLAGE State IL Zip Code 60007

Name of Owner: ACME FINISHING CO. INC.

Address: _____

Street, R.R. # or P. O. Box 1595 OAKTON

City ELK GROVE VILLAGE State IL Zip Code 60007

Contact Name: MR. DENNIS WALTERS, VICE PRESIDENT

phone number (312) 640-7890

USEPA I.D. No. ILD 005087812 IEPA Site No. 0314400002 new#

old# 0314400010G

Closure shall be: ☒ Complete ☐ Partial (check one)

1. Attach the Part A for this facility and a map diagram or picture showing the facility lay-out and the area(s) to be closed.
2. State the reason of closure. part "A" attached w/map diagram. Please note the treatment tank&storage of F018 waste became not applicable when F018 waste was removed as a hazardous waste during fall of 1980 by USEPA. Thus only drum storage area is of concern. The reason for closure is to convert the storage area to a temporary area of less than 90 days as the company has determined they do not need a long term storage area.
3. Provide an estimate of the maximum inventory of waste in storage during the life of the facility. Include a list of hazardous wastes, their codes, and amount in storage at the time of closure.

This closure plan is prepared after all hazardous waste except one paint waste has been properly disposed at an EPA permitted site. All ongoing hazardous waste streams will be properly disposed within 90 days of their generation. This has been an ongoing project over the past months. If needed, the quantity&type of hazardous waste disposed can be furnished. Now only waste stream D001-paint waste remains. (it is a one time waste resulting from paint becoming obsolete during 1984) There are 24 drums of the excess paint waste.

4. Provide a schedule of closure that briefly describes how and when the facility will be closed. AN ILL. supplemental special waste stream disposal permit has been obtained. the disposer-EW of Coal City, Ill. will take it as soon as the steel mill resumes buying supplemental fuel. This is projected to be within 60 days. Within 20 days thereafter, assuming IEPA has approved this closure plan, the asphalt storage area(28'x46') will be washed with a industrial detergent and certified closed by company & an independant ILL. reg. prof. engineer. The surrounding area is clean from contamination & will remain so.

5. Describe the steps taken at the time of closure to remove hazardous waste residues from the tank(s), its' discharge control equipment and discharge confinement structures.

Not applicable-drum storage only

6. Describe the steps taken to remove containers, liners, base and soil containing or contaminated with hazardous waste. The drums are in good condition. There have been no leaks or spillage and the area is basically clean. After drums are removed, the area will be cleaned with an industrail detergent & this soap material will be used off. If required this washwater (est. at 55 Gal) can be collected and disposed after testing to sewer or treatment plant.

Certification: The undersigned hereby makes an application for a Closure Plan approval and certifies that the information referenced herein is true, correct and current.

Deanna J. Altman *Vice Pres.*
Signature of Operator

ACME FINISHING CO., INC.
Name

1595 OAKTON
Address

ELK GROVE VILLAGE, IL 60007

Deanna J. Altman *Vice Pres.*
Signature of Owner

ACME FINISHING CO., INC.
Name

1595 OAKTON
Address

ELK GROVE VILLAGE, IL 60007

This Agency 1983 is authorized to require this information under Illinois Revised Statutes, Chapter 111 1/2, Section 1094. Disclosure of this information is required. Failure to do so may result in a civil penalty up to \$25,000 for each day of violation, up to \$50,000 for each day of violation and imprisonment up to five years. This form has been approved by the Forms Management Center.

**C.2 Compliance and
Enforcement**



Land and Chemicals Division

☒ RTC

Type of Document:

- ☐ Termination of Order
☐ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing Notice and Opportunity to Confer
☐ State Notification of Enforcement Action
☐ Other Correspondence

Facility Name:

Aerme Finishing Company, Inc.

Facility Location:

1595 Dakton Street

City:

Elk Grove Village

State:

IL

U.S. EPA ID#:

ILD 005 087 812

Assigned Staff:

Shula Burrus

Phone:

6-3587

Name	Signature	Date
Author	<u>Shula Burrus</u>	<u>1/23/08</u>
Section Chief Initial Review	<u>M. S. Mc</u>	<u>1/23/08</u>
Regional Counsel	<u>Step</u>	<u>1/23/08</u>
Section Chief Final Review		
RCRA Branch Chief	<u>Walter Davis</u>	<u>1/24/08</u>

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make three copies of the contents of this folder:
One copy for the assigned staff;
One copy for the section file; and
One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 25 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dennis Walters, President
Acme Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: Acme Finishing Company, Inc.
U.S. EPA ID. NO.: ILD 005 087 812

Dear Mr. Walters:

On September 26, 2007, the United States Environmental Protection Agency (U.S. EPA) issued Acme Finishing Company, Inc. (Acme Finishing) a Notice of Violation (NOV). U.S. EPA received Acme Finishing's responses to this NOV dated December 18, 2007 and January 18, 2008.

This letter is to inform you that U.S. EPA has reviewed Acme Finishing's responses and determined that no further action will be taken at this time. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. Acme Finishing may be evaluated by U.S. EPA and the Illinois Environmental Protection Agency (IEPA) in the future.

If you have any questions or concerns regarding this matter, please contact Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,

A handwritten signature in cursive script, reading "Willie H. Harris", is written over the typed name.

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Todd Marvel, Illinois Environmental Protection Agency

7001 0320 0006 1448 3922

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

Acme Finishing
ILD 005087 812

Acme Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, IL 60007

SENDER: COMPLETE THIS SECTION

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Dennis Walters, President
Acme Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, IL 60007

2. Article Number
(Transfer from service label)
7001 0320 0006 1448 3922

PS Form 3811, March 2001

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) WP Walters
B. Date of Delivery 1-28-08
C. Signature WP Walters
☒ Agent
☐ Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:
☐ Yes
☐ No

3. Service Type
☒ Certified Mail
☐ Registered
☐ Insured Mail
☐ Express Mail
☒ Return Receipt for Merchandise
☐ C.O.D.

4. Restricted Delivery? (Extra Fee)
☐ Yes
☐ No

Domestic Return Receipt
102595-01-M-1424



ISO 9001:2000 CERTIFIED

12/18/2007

Sheila Burrus

U.S. Environmental Protection Agency

Region 5

77 W. Jackson Blvd.

Chicago, IL. 60604

acme finishing company inc.

1595 Oakton Street, Elk Grove Village, IL 60007

(847) 640-7890 (800) 733-9229 fax (847) 640-0298

www.acmefinishing.com

Attention: LR-J8

Re: Notice of Violation

Acme Finishing Company, Inc.

U.S. EPA ID. NO.: ILD 005 087 812

Dear Ms. Burrus:

Acme Finishing Co., Inc. received the Violation Notice referenced above along with your report from the visit on September 26, 2007. Acme received this document on November 26th, 2007. Acme Finishing has taken the necessary measures to fully comply with the requirements to be eligible for the exemption from the requirement to obtain a hazardous waste storage permit.

I will detail the corrective measures taken to comply with the items listed in the report. For simplicity sake, we will refer to the items as Item A through Item H as they are listed in the report.

Item A references the lack of names, addresses and phone numbers of primary and alternative emergency coordinators. This has been corrected. Please refer to the enclosed Contingency Plan for verification that this has been rectified.

Item B refers to the fact that our contingency plan was not submitted to the local police department, fire department and hospitals. Our contingency plan has now been forwarded to these local agencies. Please find copies of the enclosed cover letters to the Elk Grove Police Department, Elk Grove Fire Department and Alexian Brothers Hospital in Elk Grove as evidence that Acme has now complied with this requirement. I have also provided the contact phone numbers should you wish to verify that these agencies have received the plan.

Item C refers to the need for an evacuation plan as part of the contingency plan. Please refer to the enclosed Contingency Plan for verification that this has been added to the plan and posted at appropriate places in the plant. The locations are the S.E. corner of the building near Line 3, the West Employee Lunchroom, The East Employee Lunchroom, The Quality Office in the middle of the production floor, and the bulletin board by the Shipping and Receiving Office.

Item D refers to the lack of training records for employees who are responsible for the proper storage and disposal of hazardous waste material. This leaves the impression that the training did not occur. The rule requires that the training be performed or directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed. Additionally, this should also be reflected in the written job descriptions for the employees responsible for handling and disposal of hazardous waste.

Acme Finishing employs an outside firm, United States Compliance Corporation, to perform the necessary training and create the training records. Retention and storage of these records then becomes our responsibility. During your inspection, we were not able to produce the training records.

Please find the enclosed training schedules for 2004 to 2006 from Carlos Galindo of U.S. Compliance detailing the training that has performed over the last 3 years. I understand this does not constitute training records but it does show evidence that the training was scheduled on these dates. I have also enclosed the Hazardous Waste training records for the most recent training performed on 10/19/2007. This training took place after your visit. Additionally, please find the training records of DOT Hazardous Waste Training Performed 10/20/2005 by Rob Gaines of U.S. Compliance and by Todd Hirstein, Hazardous Material Compliance Officer for the Illinois Department of Transportation. I have also enclosed a copy of the contract covering this training. Finally, I have enclosed copies of Annual Hazardous Waste Training Records from 11/5/2001, and 11/13/2003. Please find the corrected Job Descriptions for our Maintenance Manager and Maintenance Technician. This is now been incorporated into our ISO Quality Management System Manual. Our Registrar is Smithers Quality Assessments of Akron Ohio.

Item E refers to the requirement that hazardous waste containers remain closed at all times except for when material is being added or removed. Our violation was at a production line where waste was in an open, uncovered 5 gallon pail. Acme does provide the proper containers to our Line personnel for the storage of these materials. In this case, it was an employee not following the rules that led to this violation. This condition has been corrected and the proper containers are now the only ones used for storage. Acme has trained the appropriate personnel on the proper handling of hazardous waste material. I have enclosed as verification a photo of an approved waste container used for this purpose.

Item F refers to the proper labeling of satellite containers for Hazardous Waste. We have properly labeled all satellite containers with the "Hazardous Waste" label. I have enclosed a photo of one of the 5 gallon containers with the proper labeling as evidence of compliance.

Item G refers to our waste storage are not complying with the requirement to leave enough space between containers to allow adequate access to the containers to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency.

Specifically, our drum storage area was not in compliance as one or more drums were obstructed and not easily accessible as there was no aisle space available to reach the drum. We have corrected that condition and I have enclosed a photo of the area for your review and as evidence of compliance. Additionally, we have posted proper storage instructions in this area as a reference tool for employees in the proper arrangement of drums inside this area. I have enclosed a photocopy of the instructions for your review.

Item H refers to the proper labeling of "Used Oil". We had marked our "Used Oil" as "Waste Oil". We have purchased "Used Oil" labels and properly attached them to the used oil drums. I have enclosed a copy of the purchase order and packing slip showing the purchase of the labels. I have also enclosed a photo of a drum with the appropriate "Used Oil" label.

I have also included the U.S. Compliance Training Outline used for the Hazardous Waste Training at Acme for your review. Please feel free to give us any feedback that might be valuable for future training programs. You will also find a copy of the Notice of Violation to cross reference our responses to the Violation Notice.

Thank you for reviewing our corrective measures stemming from this violation notice. Please call me at 847-640-7890, extension 44, if there are any questions on our response or if you need any additional information or documentation. If, in your opinion, any of these remedies are insufficient to correct the problem, please let me know and I will do whatever we need to do to be in compliance with the provisions of the Resource Conservation and Recovery Act (RCRA) and specifically, those regulations related to the generation, treatment and storage of hazardous waste.

Acme Finishing Company, Inc. has a long history as a good Corporate Citizen and we take that responsibility very seriously. We welcome the opportunity this has afforded us to improve our plant operations and remain compliant with all aspects of our environmental laws.

Sincerely,



Steve Jayhan
General Manager
Acme Finishing Company, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

19 NOV 2007

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dennis Walters, President
Acme Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: Notice of Violation
Acme Finishing Company, Inc.
U.S. EPA ID. NO.: ILD 005 087 812

Dear Mr. Walters:

On September 26, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected the Acme Finishing Company, Inc. (Acme Finishing), located in Elk Grove Village, Illinois. The purpose of the inspection was to evaluate Acme Finishing's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed copies of the inspection reports for your reference.

Based on the U.S. EPA's September 26, 2007, inspection, which included personal observations and a review of records and information provided by Acme Finishing personnel, U.S. EPA finds that Acme Finishing is engaged in the storage of hazardous waste without a hazardous waste storage permit, and is in violation of the requirements of the Illinois Administrative Code (IAC), and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, Acme Finishing must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR §§262.34(a) and (c)]. Specifically, we find that Acme Finishing is in noncompliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

- a. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must include in its contingency plan the names, home addresses and telephone numbers of the primary and alternate emergency coordinators. See 35 IAC § 722.134(a)(4) [40 CFR §262.34(a)(4)]; 35 IAC §725.152(d) [40 CFR §265.52(d)]. This

is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC §722.134(a)(4), which requires compliance with 35 IAC Part 724, Subpart D; and is also a violation of the requirement of 35 IAC §724.152(d) [40 CFR §264.52(d)]. At the time of the September 26, 2007, inspection, Acme Finishing's contingency plan did not include the alternate emergency coordinators' home address nor home telephone number. Acme Finishing therefore failed to comply with above-mentioned conditions for a hazardous waste storage permit exemption, and violated the above-referenced hazardous waste storage facility contingency plan requirements.

- b. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must submit a copy of the facility contingency plan to all local police departments, fire departments, hospitals and local response teams that may be called upon to provide emergency services. See 35 IAC §§722.134(a)(4) and 725.153(b) [40 CFR §§ 262.34(a)(4) and 265.53(b)]. At the time of the September 26, 2007, inspection, Acme Finishing had not submitted a copy of the facility contingency plan to local police departments, hospitals and local response teams that may be called upon to provide emergency services. Acme Finishing therefore failed to comply with the conditions for a hazardous waste storage permit exemption by virtue of its violation of the hazardous waste storage facility contingency plan submittal requirements.
- c. In order to avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must include an evacuation plan in its contingency plan. The evacuation plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes. See 35 IAC §725.152(f) [40 CFR §265.52(f)]. At the time of the September 26, 2007, inspection, Acme Finishing's contingency plan did not include an evacuation plan. Acme Finishing therefore failed to comply with the conditions for a hazardous waste storage permit exemption by virtue of its violation of the hazardous waste storage facility contingency plan content requirements.
- d. To avoid the need for a hazardous waste storage permit, a large quantity generator of hazardous waste must ensure that facility personnel complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with applicable hazardous waste storage facility performance standards and that they review such training annually. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. A large quantity generator of hazardous waste must also maintain the job title for each position at the facility related to hazardous waste management, the name of the employee filling each job, as well as a written job description, a written description of the training, and training records on current and

former employees. See 35 IAC §§ 722.134(a)(4) and 725.116(a)-(e) [40 CFR §§ 262.34(a)(4) and 265.16(a)(1)-(3),(b),(c),(d)(1)-(4) and (e)]. At the time of the September 26, 2007, inspection, Acme Finishing had not ensured that Acme Finishing personnel had completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensured Acme Finishing's compliance with applicable hazardous waste storage facility performance standards. At the time of the September 26, 2007, inspection, Acme Finishing had not ensured that such a training program was directed by a person trained in hazardous waste management procedures, and included instruction which taught Acme Finishing personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they were or are employed. At the time of the September 26, 2007, inspection, Acme Finishing also had not maintained a written description of the type and amount of both introductory and continuing training that will be given to its hazardous waste management employees and records that documented that the training and job experience required has been given to, and completed by its employees. Acme Finishing therefore failed to comply with the conditions for a hazardous waste storage permit exemption by virtue of its violation of the hazardous waste storage facility personnel training requirements.

- e. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must always keep closed a container holding hazardous waste, except when it is necessary to add or remove waste. See IAC §722.134(d)(2)[40 CFR §262.34(d)(2)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC §724.273(a)[40 CFR §264.173(a)]. At the time of the September 26, 2007, inspection, Acme Finishing failed to keep one 5-gallon pail of paint waste closed when not in use. Acme Finishing therefore failed to comply with the conditions for a hazardous waste storage permit exemption by virtue of its violation of the hazardous waste storage facility requirement.
- f. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must properly label or clearly mark its satellite containers with the words, "Hazardous Waste" or with other words that identify the contents of the container. See 35 IAC §722.134(c)(1)[40 CFR §262.34(c)(1)]. At the time of the September 26, 2007, inspection, Acme Finishing had not labeled or marked one 5-gallon pail of hazard paint waste with the words, "Hazardous Waste" or with other words that identify the contents of the container. Acme Finishing therefore failed to comply with conditions for a hazardous waste storage permit exemption by virtue of its violation of the hazardous waste storage container labeling and identification requirement.
- g. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain aisle space to allow the unobstructed movement of personnel,

fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency. See 35 IAC §§722.134(a)(4) and 35 IAC 725.135 [40 CFR §262.34(a)(4) and 40 CFR §265.35]. This is also a requirement of owners and operators of hazardous waste storage facilities, under 35 IAC §§724.135 and 724.135 [40 CFR §§264.35 and 264.35]. At the time of the September 26, 2007, inspection, Acme Finishing had not maintained aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to the hazardous waste storage area. Acme Finishing therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage aisle space requirement.


- h. A person who stores used oil in containers and tanks must ensure that the containers and tanks are marked clearly with the words, "Used Oil". See 35 IAC §739.122 (c)(1) [40 C.F.R. §279.22(c)(1)]. At the time of the September 26, 2007, inspection, Acme Finishing had not marked three containers containing used oil with the words, "Used Oil". Acme Finishing therefore violated the used oil storage regulations.

At this time, U.S. EPA is not requiring Acme Finishing to apply for a hazardous waste storage permit, so long as Acme Finishing immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the RCRA, 42 U.S.C. 6928(a), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection, and/or which you plan to take, to establish compliance with the above conditions and requirements.

However, please be advised that Acme Finishing's compliance with the conditions and requirements described above will not relieve Acme Finishing of its liability for the violations identified in this letter. U.S. EPA reserves the right to bring further enforcement actions (including an action for civil penalties) against Acme Finishing for the violations identified in this letter.

You should submit your response to Sheila Burrus, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.
If you have any questions regarding this letter, please contact Ms. Burrus, of my staff, at (312) 886-3587.

Sincerely,


Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Acme Finishing Company, Inc.

U.S. EPA ID. No.: ILD 005 087 812


LOCATION ADDRESS: 1595 Oakton Street
Elk Grove Village, Illinois 60007

NAICS CODE: 332812

DATES OF INSPECTION: September 26, 2007

U.S. EPA INSPECTOR: Sheila Burrus

PREPARED BY:



Sheila Burrus
Environmental Protection Specialist

11/5/07

Date:

REVIEWED BY:



for
Lorna M. Jereza, Chief
Compliance Section 1
RCRA Branch
Land and Chemicals Division

11-7-07

Date:

Purpose of Inspection

The purpose of the inspection was to conduct an unannounced compliance evaluation inspection (CEI) at Acme Finishing Company, Inc. (Acme Finishing) located at 1595 Oakton Street, Elk Grove Village, Illinois 60007, to evaluate Acme Finishing compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to the management of hazardous waste.

The U.S. EPA Small Business Resources Information Sheet, and the U.S. EPA - Region 5 Pollution Prevention State Contact List, and the Illinois Waste Management and Research Center Sustainable Solutions Brochure were given to Dennis Walters, President at Acme Finishing by the inspector during the September 26, 2007 inspection.

Plant Description/Background

Acme Finishing is a specialty finishing company that provides paint and powder coating services to manufacturers of metal products.

Acme Finishing notified the U.S. EPA of its hazardous waste activities as a large quantity generator on or about November 17, 1980.

Waste Generation

Hazardous waste generated by Acme Finishing under the identification number ILD 005 087 812 are primarily waste solvent and paint (D001, D035, F003, F005). The waste solvent and paint is generated from spray gun cleaning activities.

Opening Conference

I arrived at Acme Finishing at approximately 8:40 a.m. on September 26, 2007. I presented my enforcement officer credentials to Mr. Walters and I explained to him that I would like to conduct a compliance evaluation inspection.

Mr. Walters and I convened in his office where I explained to Mr. Walters that I would be conducting a record review as well as a visual site inspection. I explained to Mr. Walters that Acme Finishing notified the U.S. EPA of its hazardous waste activities as a large quantity generator of hazardous waste on or about November 17, 1980.

Records Review

At the conclusion of the opening conference, I stated that I would like to conduct a records review followed by a visual site inspection (VSI).

I asked Mr. Walters if I could review Acme Finishing's hazardous waste manifests, land disposal restrictions forms, annual report, hazardous waste contingency plan, hazardous waste training records, waste analysis data and records of weekly inspections for the hazardous waste storage area. Steven Jayhan, General Manager assisted Mr. Walters with the gathering of Acme Finishing records for my review.

My observations are categorized below:

Contingency Plan/Emergency Procedures

I began the records review by reviewing the most current hazardous waste contingency plan dated October 2006. Acme Finishing's contingency plan does not include an evacuation plan nor the alternative emergency coordinator's home address or home phone number. Acme Finishing did not submit copies of the most current contingency plan to local authorities or emergency response teams. I informed Mr. Walters that it is required to submit the most current copy of its contingency plan to local authorities and emergency response teams as required for large quantity generators.

Personnel Training Records

Acme Finishing does not have a hazardous waste program in place for employees managing hazardous waste. Acme Finishing job descriptions for its employees managing hazardous waste does not include the initial or annual hazardous waste training nor does it include a written description of hazardous waste management responsibilities as required for large quantity generators.

Weekly Inspection Records

Acme Finishing conducts weekly inspections of its hazardous waste storage area but does not document those inspections. I informed Mr. Walters that Acme Finishing must begin documenting weekly inspections of its hazardous waste storage area.

I reviewed hazardous waste manifests, land disposal restriction records, annual reports, and waste analysis data records. All records were in complete order and well documented. Acme Finishing is properly maintaining these records on site as required for large quantity generators.

Visual Site Inspection

Mr. Walters and I began the visual site inspection (VSI) in the production area where seven production lines are currently located. The production lines consist of liquid/powder coating and screening/assembly of parts. We then proceeded to the storage room. There was one 55-gallon satellite accumulation drum of waste solvent and paint located in this room. The drum was labeled and closed (Photograph 1). We proceeded to the spray line/stripping area. I observed

one open and unlabeled 5-gallon pail of liquid (Photograph 2). I was informed by an employee that the pail held waste spent solvent and that it would be transferred to a 55-gallon satellite accumulation hazardous waste storage drum. I informed Mr. Walters and the employee that the pail must be labeled and covered when hazardous waste is not being added or removed from the container.

We then proceeded to the hazardous waste storage area. The designated drum accumulation area which contains hazardous and non-hazardous waste drums is located in the northeast corner of the facility.

The hazardous waste storage area contained six, 55-gallon drums of waste paint solvent (F003, F005). The containers were labeled with the words, "Hazardous Waste" and closed. The hazardous waste storage area did not have adequate aisle space.

Mr. Walters indicated that Acme Finishing also generates nonhazardous waste from its powder coating operation. The small particles of powder are disposed of as special waste.

Next, we proceeded to the used oil storage area. I noted two 55-gallon drums of oil were not labeled "Used Oil" but instead labeled "Waste Oil" (Photograph 3 and 4). Mr. Walters informed me that Beaver Oil Company in Hodgkins, Illinois takes all of Acme Finishing used oil.

We proceeded to the maintenance storage area where I observed boxes of fluorescent spent bulbs. The boxes were not labeled with the words, "Universal Waste" (Photograph 5). I informed Mr. Walters that the boxes must be labeled with the words universal waste.

Closing Conference

In closing, I summarized where Mr. Walters had taken me during the VSI and what information Mr. Walters had presented to me. I also summarized my concerns to Mr. Walters and Mr. Steven Jayhan. I concluded my CEI at approximately 1:15 p.m. and subsequently departed from the Acme Finishing facility.

ATTACHMENTS:

Inspection Checklist
Photographs 1 - 5



Photograph #1 - Satellite Accumulation – labeled and closed

Installation Name: Acme Finishing Company, Inc.

Location Address: 1595 Oakton Street, Elk Grove Village, Illinois

Date of Inspection: September 26, 2007



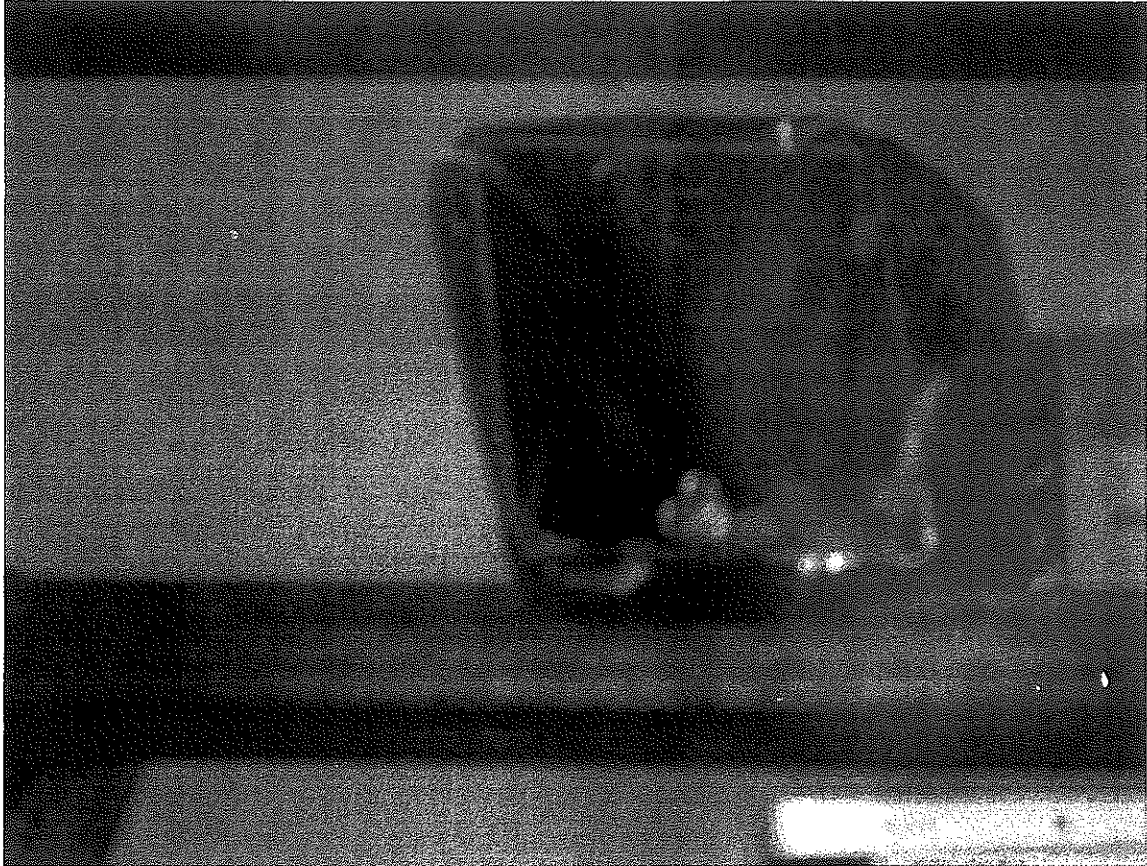
Photograph #2 Unlabeled and opened satellite container of waste paint solvent
Installation Name: Acme Finishing Company, Inc.
Location Address: 1595 Oakton Street, Elk Grove Village, Illinois
Date of Inspection: September 26, 2007



Photograph #3 Used oil drum incorrectly labeled waste oil
Installation Name: Acme Finishing Company, Inc.
Location Address: 1595 Oakton Street, Elk Grove Village, Illinois
Date of Inspection: September 26, 2007



Photograph # 4 Used oil drum incorrectly labeled waste oil
Installation Name: Acme Finishing Company, Inc.
Location Address: 1595 Oakton Street, Elk Grove Village, Illinois
Date of Inspection: September 26, 2007



Photograph # 5 Universal Waste Storage Area – unlabeled boxes
Installation Name: Acme Finishing Company, Inc.
Location Address: 1595 Oakton Street, Elk Grove Village, Illinois
Date of Inspection: September 26, 2007

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.123(c)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	Is there any hazardous waste ready for transport off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.130
	If so, is the generator complying with the pre-transport requirements in Subpart C? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a))	Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(1))	A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	and/or B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	and/or D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(722.134(a)(2))	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(3))	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(722.134(a)(4))	Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:	
	Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	If "No", go to Subpart J.	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	725.214
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	opened Spill Pail of spent Solvent

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	NO documented inspections
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Comments:</p>	
	<p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: If "No", go to Subpart C.</p>	
	<p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	725.211
(725.211) (725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____ provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> a liner (external to the tank); or a vault; or a double-walled tank; or an equivalent device (approved by the Board)? <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(h))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that: - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____</p> <p>- Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Inadequate aisle space
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)				Violation
(725.152(c))	Does the plan describe arrangements with: <ul style="list-style-type: none"> - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
(725.152(d))	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>				<i>Alternate emergency coordinator home address & phone number missing.</i>
(725.152(e))	Does the plan identify all emergency equipment including: <ul style="list-style-type: none"> - description? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the list of emergency equipment up-to-date? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.152(f))	Does the plan include: <ul style="list-style-type: none"> - an evacuation plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 				
(725.153)	Has the contingency plan (including all revisions) been: <ul style="list-style-type: none"> a) maintained at the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: <ul style="list-style-type: none"> - police department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> 				<i>Did not provide copy of plan to local authorities</i>
(725.154)	Has the contingency plan been reviewed and revised whenever: <ul style="list-style-type: none"> a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 				
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
Note: If the facility has had a release, explain in detail.					

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes _____ No <u>✓</u> N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes _____ No _____ N/A <u>✓</u></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes _____ No _____ N/A <u>✓</u></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes _____ No _____ N/A <u>✓</u></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes _____ No _____ N/A _____ - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No _____ N/A _____ - key parameters for automatic waste feed cut-off systems? Yes _____ No _____ N/A _____ - communications or alarm systems? Yes _____ No _____ N/A _____ - response to fire or explosions? Yes _____ No _____ N/A _____ - response to groundwater contamination incidents? Yes _____ No _____ N/A _____ - shutdown of operations? Yes _____ No _____ N/A _____ 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes _____ No _____ N/A _____</p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes _____ No <u>✓</u> N/A _____</p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes _____ No _____ N/A _____ 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <u>✓</u> No _____ N/A _____ 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes _____ No <u>✓</u> N/A _____ 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes _____ No <u>✓</u> N/A _____ 	initial & annual training missing IR job descriptions
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes _____ No _____ N/A _____</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the plan on-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled. SUBPART D: RECORDKEEPING AND REPORTING Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
722.140(a)		722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Section 722.142 Exception Reporting If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.141(b)
722.142(a)(1)		
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.142(a)(2)
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.143
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.150
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.160
	COMMENTS:	722.170



Waste, Pesticides and Toxics Division

Type of Document: ☒ Notice of Violation and Inspection Report/Checklist
☐ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Pre-Filing Notice and Opportunity to Confer
☐ Return to Compliance Letter
☐ State Notification of Enforcement Action
☐ Other Correspondence

Facility Name: Acme Finishing Company, Inc.

Facility Location: 1595 Oakton Street

City: Elk Grove Village State: IL

U.S. EPA ID# IL005087812

Assigned Staff Shula Burrus Phone: 6-3587

Name	Signature	Date
Author	<i>Shula Burrus</i>	11/5/07
^{Thorn} Regional Counsel	<i>Steph</i>	11/15/07
Section Chief	<i>Lane M. Jay</i>	11/15/07

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file;
 - One copy for the branch file; and
 - One copy for the official file copy.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.



United States Compliance

REFERENCE ITEM A - PAGES 12+13

REFERENCE ITEM C - LAST PAGE

CONTINGENCY & EMERGENCY PLAN

Acme Finishing Company, Inc.

1595 East Oakton Street
Elk Grove Village, IL 60007

(847) 640-7890

EPA ID# ILD 005 087 812

Emergency Response Coordinator:

Bill Godwin

Alternate Coordinator:

Steve Jayhan

October 2006

Dial 911 when life or property is threatened.

United States Compliance Corporation

301 Carlson Parkway • Suite 200 • Minnetonka, MN 55305 • Phone 952.252.3000 • Fax 952.252.3001

www.uscompliance.com

US EPA
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AUTHORITY TO ACT

Management of Acme Finishing Company, Inc. gives the Emergency Response Coordinator and the Emergency Response Team Members the authority to act in accordance with this Emergency Plan.

Dennis Walters

Title

Date

EMERGENCY RESPONSE PHONE NUMBERS

Acme Finishing Company, Inc.

1595 East Oakton Street
Elk Grove Village, IL 60007
(847) 640-7890
EPA ID# ILD 005 087 812

EMERGENCY: CALL 9-1-1

FIRE:	Elk Grove Village Fire Department 902 Brantwood Avenue Elk Grove Village, IL 60007	847-364-2672
POLICE:	Elk Grove Village Police Department 901 Wellington Elk Grove Village, IL 60007	847-357-4100
LOCAL REGULATING AGENCY:	Illinois EPA 1701 South 1 st Avenue, Suite 600 Maywood, IL 60153	708-338-7900
HOSPITAL:	Alexian Brothers Medical Clinic 850 Biesterseld Road Elk Grove Village, IL 60007	847-437-5500
EMERGENCY COORDINATOR:	Steve Jayhan	847-640-7890
SPILL REPORTING AGENCY:	Agency Spill Hotline	708-531-5900
LOCATION OF EMERGENCY EQUIPMENT:	See facility map	
COMPLIANCE CONSULTANTS:	United States Compliance Corp. 6121 Baker Road #101 Minnetonka, MN 55345	847-298-8803 Monday - Friday 8:00 am to 4:30pm

Be prepared to give company name, address, EPA #, date and time of incident, type of emergency, name and quantity of material involved, extent of injuries, and possible hazards to human health and environment outside the facility.

REGULATORY AGENCIES

LOCAL: Illinois EPA
1701 South 1st Avenue, Suite 600
Maywood, IL 60153
708-338-7900

STATE: Illinois EPA
2200 Churchill Road
Springfield, IL 62706
217-782-5562

**FEDERAL EPA
REGIONAL
ADMINISTRATOR:** EPA Region V
77 West Jackson Blvd.
HSC-9j
Chicago, IL 60604
312-886-1964

COAST GUARD: N/A

**NATIONAL
RESPONSE
CENTER:** 1-800-424-8802

EMERGENCY RESPONSE TEAM

Response Team Objectives

The Emergency Response Team concept as defined by this plan combines elements of numerous private and government interest groups into one functional, safety aware and responsive group of company employees. This group of company employees, termed "The Emergency Response Team," consists of:

1. An Emergency Response Coordinator
2. An Emergency Response Communicator
3. Several Emergency Response Area Directors
4. Several Emergency Response Area Assistants

The structure of the team is consistent with the Community Right to Know Response Team outline.

The charge given to the team is a preventative or loss deterrent team as well as a first response team.

The team members are responsible for the maintenance of company safety standards, policies, procedures, and the execution of those safety standards.

The areas of interest include all facets of the safe operation of the facility. Special education and interest is focused upon loss and damage prevention, lead and spill control, pollution control, and hazardous chemical control, medical response to injury, and proper evacuation methods and execution.

The Emergency Response Team is trained to use special equipment effectively in the response procedure. This equipment is generally contained within various response carts, which are located strategically throughout the facility. These carts contain such elements as leak stop material, medical material, personal protective equipment, spill absorption material, shovels, oxygen, and other response materials including DOT and NFPA response guides outlining the correct applicable procedure.

Emergency Response Coordinator Functions

Whenever there is an imminent or actual emergency situation, the Emergency Response Coordinator (or designee when the Emergency Response Coordinator is on call) must immediately:

1. Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and
2. Notify appropriate state or local agencies with designated response roles if their help is needed.

Whenever there is a release, fire or explosion, the Emergency Response Coordinator must immediately identify the character, exact source, amount and real extent of any released materials. This may be done by observation or review of facility records or manifests and, if necessary, by chemical analysis.

Concurrently, the Emergency Response Coordinator must assess possible hazards to human's health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g. the effects of any toxic, irritating, or asphyxiating gases that are generated or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

If the Emergency Response Coordinator determines that the facility has had a release, fire, or explosion, which could threaten human health or the environment outside the facility, he must report his findings as follows:

If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriated local authorities. He must be available to help appropriate local authorities decide whether local area should be evacuated; and he must immediately notify either the government official designated as the on-scene coordinator for the geographical area (in the applicable regional contingency plan under 40 CFR Part 1510) or the National Response Center (using their 24-hour toll free numbers 800-424-8802). This report must include:

- a. Name and telephone number of reporter
- b. Name and address of facility
- c. Time and type of incidents
- d. Name and quantity of material(s) involved, to the extent known:
- e. The extent of injuries, if any: and
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- g. The possible hazards to human health or the environment outside the facility.

During an emergency the Emergency Response Coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste and removing or isolating containers.

If the facility stops operations in response to a fire, explosion, or release, the Emergency Response Coordinator must monitor for leaks, pressure build-up, gas generation or ruptures in valves, pipes or other equipment, whenever this is appropriate.

Immediately after an emergency, the Emergency Response Coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from release, fire, or explosion at the facility.

The Emergency Response Coordinator must ensure that, in the affected area(s) of the facility:

1. No waste that may be incompatible with the released material is treated, stored, or disposed of until clean-up procedures are completed; and
2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

The owner or operator must notify the appropriate state and local authorities that the facility is in compliance with paragraph (8) of this section before operations are resumed in the affected area(s) of the facility.

The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 5 days after the incident, the Coordinator must submit a written report on the incident to management. The report must include:

- a. Name, address and telephone number of the owner operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time and type of incident (e.g. fire, explosion);
- d. Name and quantity of material(s) involved;
- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable;
- g. Estimated quantity and disposition of recovered material that resulted from the incident.

Emergency Response Team Duties

Emergency Response Coordinator/Hazardous Material and Waste Director:

- Coordinates the resources and procedures of the company to most effectively support the response team.
- Responsible for the acquisition and maintenance of necessary resources for the team.
- Directs the clean up, documentation assignments and pollution issues surrounding any incident.
- Also responsible for weekly hazardous material inspections.
- Trained in the proper management and handling of hazardous materials and waste streams.

Emergency Response Communicator/Hazardous Material and Waste Handler:

- Handles all communication needs in-house relating to the response, medical care, transportation, and call list response.
- Communicates to response team outside response area to the nature of loss or damage, response being taken, evacuation communication, assembly communication and recall.
- Communicates to coordinator any request for resources necessary for response.
- Handles media and non-participant communications.
- Trained in the proper management and handling of hazardous materials and waste streams.

Emergency Response Area Director/Hazardous Material and Waste Handler:

- The person responsible as the first responder to the incident within their assigned area.
- Performs and directs any required response.
- Trained in the proper management and handling of hazardous materials and waste streams.

Emergency Response Area Assistant/Hazardous Material and Waste Handler:

- Person responsible for evacuating and controlling the employees within their assigned area.
- Leads evacuations, assembly, communicated to his/her assembly, directs next action to his/her assembly.
- Trained in the proper management and handling of hazardous materials and waste streams.

EMERGENCY CONTACT INFORMATION

The following procedures are to be used in case of a fire, explosion, or release (spill) involving hazardous materials. Each situation should be approached with utmost caution with regards to safety. In each case, the Emergency Response Coordinator at Acme Finishing Company, Inc. must be notified.

The Emergency Response Coordinators are:

PRIMARY:	Steve Jayhan 847-640-7890
-----------------	------------------------------

SECONDARY:	Gavi Flores 847-640-7890
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The following emergency numbers are to be used if any of these support departments are required. Each of these departments has been notified and is aware of the Contingency Plan procedures.

FIRE DEPARTMENT:	DIAL 911
-------------------------	----------

RESCUE SQUAD:	DIAL 911
----------------------	----------

LOCAL SHERIFF:	Dial 911
-----------------------	----------

P.A. SYSTEM:	How to activate
---------------------	-----------------

HOSPITAL:	Alexian Brothers Medical Clinic 850 Biesterseld Road Elk Grove Village, IL 60007 847-437-5500
------------------	--

FIRST AID PERSONNEL:	N/A
---------------------------------	-----

EMERGENCY RESPONSE TEAM MEMBERS

The following individuals are assigned to the facility's Emergency Response Team. These individuals are familiar with the facility's emergency procedures and have received training in the use of facility fire fighting equipment and/or hazardous waste spills containment and clean up. Designated individuals are familiar with the facility's utilities and with proper procedures for facility power isolation and shut down of fuel supplies.

Title:	Emergency Response Coordinator
Name:	Steve Jayhan
Address:	Steve Jayhan
Home Phone:	26 N. York 847-973-1599
	Foxlake, IL 60020
Work Phone:	847-640-7890

Title:	Emergency Response Alternate Coordinator
Name:	Gavi Flores
Address:	939 MAPLE LANE
Home Phone:	ELK GROVE VILLAGE, IL. 60007
Work Phone:	847-640-7890 847-815-6467

Title:	Emergency Response Communicator
Name:	Gavi Flores
Address:	939 MAPLE LANE
Home Phone:	ELK GROVE VILLAGE, IL. 60007 847-815-6467
Work Phone:	847-640-7890

Title:	Area Director
Name:	Ronald A Gibson
Address:	521 Bryon Street, CRYSTAL LAKE, IL. 60014
Home Phone:	847-365-3653
Work Phone:	847-640-7890

Title:	Area Director
Name:	George Andujan
Address:	766 5 th Ct. #G
	Des Plaines, IL 60014
Home Phone:	847-635-8791
Work Phone:	847-640-7890

Title:	Area Director
Name:	Victor Melendez
Address:	642 Carroll Square Elk Grove Village, IL 60007
Home Phone:	847-952-8162
Work Phone:	847-640-7890

OUTSIDE SUPPORT SERVICES

Police Department

Police are available to direct traffic, handle crowds, and provide security services. The police department has a copy of the Contingency and Emergency Response Plan.

Fire Department

The fire department will respond to fires and other emergency incidents providing primary fire protection and rescue services. The fire department has a copy of the Contingency and Emergency Response Plan.

Hospital

The hospital is available to provide medical service. The hospital has a copy of the Contingency and Emergency Response Plan.

Spill Response Services

Spill response services will be delegated to an outside licensed Service Company.

BASIC EMERGENCY RESPONSE

8 STEP PROTOCOL

- CALL 911, if necessary
 1. Isolate and Evacuate
 2. ID Material and/or Cause of Incident
 3. Risk/Hazard Assessment
 4. Emergency Equipment
 5. Notification
 6. Control
 7. Decontamination
 8. Termination

EMERGENCY CONTROL CENTER

In the event of an emergency, where it is feasible to remain on the premises without unduly endangering facility personnel, the following procedures will be followed:

1. An Emergency Control Center will be established at the .
2. The Emergency Response Coordinator will report immediately to the Emergency Control Center.
3. The Area Response Directors will report immediately to the Emergency Control Center. The Emergency Response Area Director whose area is affected will stay at the incident site and execute, by protocol, the indicated response.

In the event of an emergency where it is necessary to evacuate the facility, the following procedure will be followed.

1. An alternate emergency control area will be established outside the facility at the front parking lot. The Emergency Response Coordinator will report immediately to the alternate emergency control area where he/she will carry out his/her duties.
2. The Response Communicator will contact the fire department, police department, and ambulance service required.
3. Each Emergency Response Area Assistant will be responsible for ensuring that all personnel have vacated their area of responsibility. They will then meet with the Emergency Response Coordinator at the emergency control area to report on area of assembly, control of situation and to be briefed on what to communicate to their employees.
4. The Emergency Response Team will report immediately to the emergency control area after completing their required protocol.
5. Maintenance will report immediately to the emergency control area.

All personnel will be thoroughly familiar with the alarm system and the evacuation plan with alternate routes. The evacuation plan is posted conspicuously. The evacuation plan is a block layout of the facility showing all exits, aisles, alarm stations and preferred exit routes for personnel during any evacuation.

BASIC EVACUATION PLAN

In the event of an evacuation, the following procedure should be followed.

Employees

Upon notification of evacuation via alarms, verbal or PA, employee must evacuate area immediately through the nearest unobstructed exit. Walk to your designated area at the front parking lot.

Report to designated area for head count.

Follow instructions of ERT Coordinator and Members.

Supervisors

1. Upon notification of evacuation via alarms, verbal or PA, employee must evacuate area immediately through the nearest unobstructed exit. Walk to your designated area at the front parking lot.
2. Report to designated area for head count. Perform head count for the department.
3. Report head count to the Emergency Coordinator.
4. If emergency incident happened in the supervisor's area, detailed information must be reported to Emergency Coordinator immediately.

Emergency Response Team (ERT)

1. Call 911, if immediate emergency services are needed.
2. ERT members will assist in the orderly evacuation of their assigned areas. They will initiate search of their designated areas including the restrooms, and closed rooms if safe to do so to assure all employees, visitors, and contractors, etc. have left the building.
3. The team members will then proceed to the command center to report all information (evacuation status, hazards in the area, etc.) to the Emergency Response Coordinator.
4. The Emergency Response Coordinator will relay the evacuation status and hazard information to necessary outside emergency services (i.e. fire department).
5. A decision will be made by the Emergency Response Coordinator and key company personnel to determine the status of the evacuation.
6. Personnel may not enter the area until the fire department releases the site and indicates it is safe to do so.

CHEMICAL RELEASE PROCEDURES

The Emergency Procedures required in the event of a release of hazardous waste or materials are as follows:

Identifying Employee

1. Evacuate out of immediate area. Also notify employees in the immediate area to keep out of area. Protect Personnel – Anyone wet by flammable liquids should remove the soaked garments and thoroughly wash the effected skin with soap and water. Personnel close to the spills potentially harmfully vapors should evacuate.
2. Eliminate ignition sources – Cigarettes should be extinguished and any spark or flame producing operation should be shut down within the vapor-spread area of the spill. Flammable liquid vapors are often heavier than air and spread naturally along the floor from higher to lower elevations. Ignition sources below and even some distances away from a spill may be vulnerable.
3. Call 911, if immediate emergency services are needed. Notify the Emergency Response Coordinator/Emergency Response Team via the PA system. Notify your immediate supervisor.
4. **DO NOT ATTEMP TO CLEAN UP THE SPILL.**

Emergency Response Team

Call 911, if immediate emergency services are needed.

1. Isolate immediate area.
 - ~ Evacuate all non-essential personnel.
 - ~ Keep all personnel out of spill area. The area should be secured.
2. Identify the spilled/released material
 - ~ Identify the cause of the spill/release.
3. Determine the risk and hazards associated with the release.
 - ~ MSDS are available on site.
 - ~ Hazardous chemical exposure levels must be quantified.

If the hazards are too great, if the hazards are manageable with proper procedures and protective equipment, the ERT may follow control and decontamination procedure if they choose to do so.

4. Obtain the required personal protective equipment for the incident.
 - ~ All personnel entering the area must don the required personal protective equipment.
 - ~ Please refer to the emergency equipment section of the Emergency Plan.
5. Notify ERT members before entering area for control.
 - ~ No ERT member may act alone.
6. Control the hazards.
 - ~ ONLY IF IT IS SAFE TO DO SO!
 - ~ If material is flammable, shut down or eliminate all sources of ignition.
 - ~ Ventilate where possible.
 - ~ Contain the spill if safe to do so. Contain the spill - Attempt to restrict the spread of the spill. Minimizing the surface area of the spill reduces the formation of flammable vapors.
 - ~ Spill containment tools include absorbents (pillows, socks and pads), non-sparking shovel and squeegees, etc. Sufficient absorbent material to control a possible spill should be kept on hand.
 - ~ All spill control equipment must be spark-proof.
 - ~ If a drum was punctured turn the drum so the puncture is facing up thus preventing more material to be released.
7. Decontaminate area using approved materials.
 - ~ Any material that can be reused should be cleaned up first. The remaining waste should be cleaned up and placed in clean drum.
 - ~ All contaminated material is to be removed and handled in the same manner. All equipment used during the clean up operation should be cleaned and put back in the proper location. Extra clean up equipment is located in the Tool Room. After the clean up is complete, the supervisor of the department should be notified that plant operation might continue.
 - ~ All emergency response personnel involved with the clean up of the spill must go through decontamination.
8. Termination
 - ~ Emergency Response Team must gather and complete the Incident Report.
 - ~ Call United States Compliance for guidance (952) 938-2228.
 - ~ Appropriate agencies must be called if release thresholds or reportable quantities (RQ) are exceeded.
 - ~ Steps must be taken to prevent a similar event from occurring.
 - ~ Retraining to be scheduled as needed.

FIRE

The basic Emergency Procedures required in the event of a fire are as follows:

Identifying Employee

1. Evacuate area immediately through the nearest unobstructed exit.
2. Call 911 if necessary.
3. Alert plant personnel over the P.A. system. Dial state message, and repeat message.
4. Walk to the emergency assembly area located at for head count.

MESSAGE: "Your attention please. Evacuate the building immediately through the nearest exit. Walk to the front parking lot."

5. Notify Emergency Response Coordinator - to call Fire Department.
6. Department Supervisors are to check for injuries and missing personnel. If injuries occur, contact the First Aid Personnel or a Supervisor. Call the Rescue Squad and/or Fire Department, if needed.
7. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.

Emergency Response Team (ERT)

1. Call 911, if immediate emergency services are needed.
2. Isolate immediate area. Evacuate all personnel. Keep all personnel from entering the building or non-emergency personnel from entering the property. The area should be secured.
3. Conduct head count.
4. Remove materials from surrounding areas that might add to the fire if safe to do so.
5. Send individual out to meet the Emergency Vehicles.
6. Allow Emergency Response Coordinator and local Fire Department to take charge when they arrive.
7. Emergency Response Coordinator will relay all known information regarding the incident to the fire department upon arrival.
8. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.
9. If a hazardous substance has been released, the Emergency Response Coordinator is to notify the necessary Response Centers. Follow hazardous material release protocol.
10. Emergency Response Coordinator will notify personnel when it is safe to reenter the facility. This may not be done until the fire department says it is safe to do so.

11. Termination

- ~ Emergency Response Team must gather and complete the Incident Report.
- ~ Appropriate agencies must be called if certain release levels or reportable quantities (RQ) are exceeded.
- ~ Call United States Compliance for guidance (952) 938-2228.
- ~ Steps must be taken to prevent a similar event for occurring.
- ~ Retraining to be scheduled as needed

EXPLOSION

The Emergency Procedures required explosion are as follows:

Identifying Employee

1. Evacuate area immediately through the nearest unobstructed exit. Walk to the emergency assembly area located front parking lot.
2. Dial 911.
3. Alert plant personnel over the P.A. system. Dial the state, and repeat message.

MESSAGE: "Your attention please. Evacuate the building immediately through the nearest exit. Walk to the front parking lot."

4. Notify Emergency Response Coordinator - to call Fire Department.
5. Department Foremen are to check for injuries and missing personnel. If injuries occur, contact the First Aid Personnel or a Supervisor. Call the Rescue Squad and/ or Fire Department, if needed.
6. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.

Emergency Response Team (ERT)

1. Call 911, if immediate emergency services are needed.
 - ~ Isolate immediate area.
 - ~ Evacuate all personnel.
 - ~ Keep all personnel from entering the building or non-emergency personnel from entering the property. The area should be secured.
2. Conduct head count.
3. Remove materials from surrounding areas that might add to the fire if safe to do so.
4. Send individual out to meet the Emergency Vehicles.
5. Allow Emergency Response Coordinator and local Fire Department to take charge when they arrive.
6. Emergency Response Coordinator will relay all known information regarding the incident to the fire department upon arrival.
7. After the fire is extinguished, all areas affected are to be cleaned up and wastes properly disposed of before resuming operations.
8. If a hazardous substance has been released, the Emergency Response Coordinator is to notify the necessary Response Centers. Follow hazardous material release protocol.

9. Emergency Response Coordinator will notify personnel when it is safe to reenter the facility.
10. This may not be done until the fire department says it is safe to do so.
11. Termination
 - ~ Emergency Response Team must gather and complete the Incident Report.
 - ~ Appropriate agencies must be called if certain release levels or reportable quantities (RQ) are exceeded.
 - ~ Call United States Compliance for guidance (952) 938-2228.
 - ~ Steps must be taken to prevent a similar event from occurring.
 - ~ Retraining to be scheduled as needed.

MEDICAL EMERGENCY

This procedure will be followed when an injury or sudden illness occurs that requires assistance from the designated company emergency responders trained in first aid and CPR. The designated company emergency responders will assess the situation to determine the need for outside emergency response. The responders will err on the side of caution when in question.

Identifying Employee

1. If an employee becomes injured or suddenly ill, the employee shall call for help.
2. 911 will be called if the condition appears to be severe.
3. When paging, the requesting person should clearly state where the emergency responders are needed.
4. The immediate supervisor and emergency response personnel will be summoned immediately for all medical emergencies.
5. Isolate immediate area.
6. Stay with victim until help arrives.

Emergency Response Team (ERT)

1. Individuals designated to respond to medical emergencies are to immediately go to the location indicated on the page.
2. Area will be assessed for all relevant hazards.
3. The injury or illness will be assessed to determine if additional assistance is necessary. Call 911, if immediate emergency services are needed.
4. If 9-1-1 is called someone will be assigned to wait near the entrance of the property to meet the paramedics at the door and to guide them to the victim.
5. Isolate immediate area. Keep all non-essential personnel from entering the area.
6. Identify hazard or cause. All hazards must be controlled.
7. All responders must don appropriate personal protective equipment (see Blood Borne Pathogen and Personal Protective Equipment Programs).
8. Notification of team members.
9. Care to be given to victim in accordance with First Aid & CPR Training.
10. All injured personnel will be accompanied by a supervisor or assigned personnel if sent off-site for medical treatment.
11. Once victim has been taken care of, decontamination procedures will begin in accordance with the Blood Borne Pathogen Program.
12. After decontamination of the area and response personnel, the team will meet to complete the appropriate paperwork.

SEVERE WEATHER RESPONSE PROCEDURE

This procedure will be followed when weather conditions indicate that a tornado or other severe weather may affect company facilities. This procedure assumes that designated personnel on the emergency call list will be contacted to make the decision to have the building employees take cover in designated shelter areas.

1. Supervisors and ERT members will monitor emergency weather broadcasts made by the National Weather Service (NWS). If the NWS broadcasts a **Tornado Watch**, they will contact the supervisors and advise them of the potential weather conditions.
2. If the NWS issues a **Tornado Warning** for the area where the company is located, the monitoring employee will immediately advise the supervisors that the warning has been issued.
3. The supervisor will decide if the appropriate weather system affects the company facility. This decision will be based on NWS broadcasts, commercial broadcasts, and observation of approaching weather.
4. If the decision is made to send employees to shelter areas, an announcement will be made on the company public address system. Employees will be accounted for in the shelter areas. Alert plant personnel over the P.A. system. Dial the state, and repeat message.

Message: "Your attention please. A tornado is expected: please take cover in the ."

5. All employees will go to shelter areas remain there until the weather system has passed and the "all clear" has been issued by the Emergency Response Coordinator.
6. Emergency Response Coordinator will issue the "all clear" after the NWS has indicated as such and after the facility has been assessed for hazards.
7. Employees must be aware of any building damage or downed power lines outside the building.
8. The Emergency Response Team will evaluate effects of the storm and will make the decision to continued building operations.

CIVIL DISTURBANCE EMERGENCY RESPONSE

The police department is available to direct traffic, handle crowds, and provide security services. The police department has a copy of the Contingency and Emergency Response Plan.

In the event of a civil disturbance, the Emergency Response Coordinator will direct the following activities:

1. Ensure that all personnel have vacated areas.
2. Close and lock all exterior building doors and windows.
3. Activate all exterior alarm systems.
4. Alert facility personnel that an emergency condition exists and emergency procedures are to be followed immediately.
5. Notify the police department - Call 911.

BOMB THREAT EMERGENCY RESPONSE

In the event that a bomb threat is received, the following action will be taken.

1. The person receiving the threat will attempt to obtain as much information as possible. See Bomb Threat Reporting Form.
2. The person receiving the threat will immediately notify the Coordinator.
3. The Coordinator will notify the police department. Subsequent action will be taken in conjunction with the police department and in accordance with emergency procedures.
4. Evacuate the premises.

In the event that evacuation of the building(s) becomes necessary, the Emergency Response Coordinator will direct any of the following activities judged necessary by the nature of the emergency:

1. Notify the police department of the evacuation activity and obtain their assistance in providing the safest route for evacuation for the general area.
2. Activate alarm systems.
3. Assign personnel to direct traffic to leave company property in an orderly, coordinated manner.
4. Organize transportation away from company property.
5. Shut down building utilities that will not be required.
6. Leave all exterior doors and windows unlocked.

BOMB THREAT REPORTING FORM

Instructions: Be calm and courteous. Listen and do not interrupt the caller. Notify your supervisor of your activity by prearranged sign, if possible.

DATE: _____ TIME: _____

Exact words of person placing the call: _____

Questions to ask.

1. When is the bomb going to explode? _____
2. Where is the bomb right now? _____
3. What kind of bomb is it? _____
4. What does it look like? _____
5. Why did you place the bomb? _____

TRY TO DETERMINE THE FOLLOWING (circle the appropriate):

Callers Identity:	Male	Female	Adult	Juvenile	
	Age: _____				
	Name: _____				
Voice:	Loud	Soft	High-pitched	Deep	
	Intoxicated				
	Other: _____				
Accent:	Local	Foreign	Region		
	Description: _____				
Speech:	Fast	Slow	Distinct	Distorted	
	Stuttered	Slurred	Nasal		
Language:	Excellent	Good	Fair	Poor	Foul
	Other: _____				
Manner:	Calm	Angry	Rational	Irrational	
	Coherent	Incoherent	Deliberate	Emotional	
	Righteous	Laughing	Intoxicated		
Background Noises:	Office Machines		Factory Machines		
	Bedlam	Trains	Music	Voices	
	Airplanes	Traffic	Party atmosphere	Mixed	
	Other: _____				

Additional Information: _____

Immediately after the call, notify the police (911) and then your supervisor and ERT.

Receiving Phone Number

Person Receiving Call

FACILITY DESCRIPTION
Acme Finishing Company, Inc.

General Description of Facility

Type of Materials Handled:	
Previous Emergency Incidents:	
Potential for Emergency Incidents:	•

HAZARDOUS WASTE GENERATED ON-SITE

EPA ID# ILD 005 087 812

WASTE STREAM	STORAGE LOCATION	WASTE ID #	ANNUAL GENERATION	MAX AMOUNT STORED

PLOT PLAN

HAZARDOUS WASTE MANAGEMENT PREVENTION MEASURES

Material/Process/Waste Inspection

All drums are inspected once a week and documented for:

1. Leaks, if found stop leak and clean up measures activated.
2. To ensure that lids and bungs are in place.
3. Ensure that drums are labeled properly.
4. Ensure waste and materials are in control and labeled properly

The storage area has:

1. Correct aisle spacing.
2. A spill kit available.
3. Records available and up to date.
4. Security measures in place.
5. Compatible materials.

Hazardous Waste Management and Training

All hazardous waste and materials are handled in accordance with federal, state, and local regulations.

Annual Right to Know Training (all employees)

1. All employees are trained in the proper handling and management of hazardous materials.
2. All employees are trained on the possible hazards associated with the materials in the workplace.

Annual Waste Management Training

1. Each employee that handles hazardous materials will be trained in the management of hazardous waste in accordance with the Code of Federal Regulations.
2. The Following issues are covered in this training:
 - a. Basic Chemistry
 - b. Hazardous Waste and Material Handling
 - c. Hazardous Waste Determination
 - i. Ignitable
 - ii. Oxidizers
 - iii. Corrosives
 - iv. Reactive
 - v. Toxicity
 - vi. Lethal
 - vii. Listed Hazardous Waste
 - d. Waste Evaluations
 - e. Disclosing a Waste Stream to Local County
 - f. Generator Status
 - g. Waste Accumulation
 - h. Waste Labeling and Storage
 - i. Weekly Waste Inspections
 - j. Manifesting Procedures/Land Ban
 - k. Restriction Forms
 - l. Annual Reporting
 - m. Record Keeping

HAZARDOUS WASTE STORAGE INSPECTION CHECKLIST

The following inspection of hazardous materials storage is completed on a weekly basis for the following:

1. All hazardous waste barrels are closed except to add or remove waste. After adding or removing waste, remove funnels and replace container's bung or lid.
2. Aisles are to be maintained between all containers for inspection personnel and, in an emergency, fire and spill control equipment.
3. Inspect all containers for leaks or deterioration of containers.
4. Care is to be taken to not spill any materials, virgin or waste, on the ground, either inside or outside the plant. No spills are allowed. In case of a spill, report to your supervisor immediately.
5. Incompatible wastes are separated by dike, berm, or wall (a strong acid and an organic solvent).
6. Waste materials are monitored to make sure like materials are stored together and not mixed. For example, catalyst-type solvent and paint are kept separate from non-catalyst materials as well as any latex materials.
7. All hazardous waste containers are properly labeled with appropriate labels noting "Hazardous Waste", identification of contents along with accumulation start date, etc. All labels are placed slightly to the side of the bung, but barrels are positioned to be able to read all waste labels.
8. Waste must be stored in a secure area, protected from unauthorized access and damage from vehicles or equipment.
9. Check materials for accumulation and shipping deadlines.
10. All containers storing hazardous materials must be sheltered from outside elements (free from sunlight). Additionally, containers must be placed on a curbed, impermeable surface with all compatible materials. (No asphalt floor materials.)
11. Barrels and containers must be emptied of all their contents before removal from inside the building and stored outside. ("Brush clean" or "drip clean" should be the empty test.) All empty barrels stored outside should be stored in horizontal position with both all covers and bungs in place or no covers on at all.

12. Containers may be thrown into the trash or dumpster under certain circumstances. Containers are defined as plastic jugs, cans, pails or barrels. No containers should be put in a dumpster unless they are brush clean or drip clean. Additionally, the container should be slashed or crushed so they cannot accumulate any liquid on a secondary use.

HAZARDOUS WASTE MANAGEMENT

JOB DESCRIPTION

Emergency Response Team Members

KNOWLEDGE NEEDED

- Must be familiar with local, state and federal regulations pertaining to hazardous waste management and response action.
- Must have good working knowledge of the hazards associated with the chemicals used at the facility and related processes.
- Must have good working knowledge of the personal protective and emergency response equipment provided.
- Must have good working knowledge of the facilities Emergency Response Plan.
- Spill response individuals must be versed in hazardous material handling techniques.

TRAINING REQUIRED

- Initial and Annual Right to Know/Hazard Communication Training.
- Annual Hazardous Waste Management Training
- On-going Emergency Response Team Training Sessions
- Hazardous Material training and refresher training needed for all members that have been approved for initial chemical spill response.

DUTIES INCLUDE

- Responsible for initiating a facility evacuation if needed. Responsible for conducting a head count at the evacuation meeting area.
- Will coordinate response to any emergency situation, which may arise. The ERT Coordinator/Hazardous Waste Director will coordinate these efforts. The ERT members will respond to a waste related incident in accordance with the Emergency Response Contingency Plan.
- Responsible to interface with local first responders. Will give first responders as much pertinent information regarding the emergency as possible.
- Responsible for making sure Hazardous Waste Director/ERT Coordinator is notified all incidents as soon as possible.

HAZARDOUS WASTE MANAGEMENT

JOB DESCRIPTION

Hazardous Waste Director/ERT Coordinator

KNOWLEDGE NEEDED

- Must be familiar with local, state and federal regulations pertaining to hazardous waste management and response action.
- Must have good working knowledge of the hazards associated with the chemicals used at the facility and related processes.
- Must have good working knowledge of all related facility programs.
- Must have good working knowledge of the facilities Emergency Response Plan.
- Must be well versed in hazardous material handling techniques.

TRAINING REQUIRED

- Initial and Annual Right to Know/Hazard Communication Training.
- Annual Hazardous Waste Management Training
- On-going Emergency Response Team Training Sessions
- Hazardous Material training and refresher training

DUTIES INCLUDE

- Has the overall responsibility for all hazardous waste activities.
- Will assure all personnel working with hazardous waste are properly trained.
- Will organize all related training sessions.
- Will assign hazardous waste duties and ensure they are completed correctly.
- Will periodically assess the Hazardous Waste Management Program.
- Will organize and maintain all relevant hazardous waste documentation (i.e., reports, manifests, LDRs, analysis, training sign-offs, etc.).
- Will coordinate the shipment of hazardous waste to licensed TSDFs through licensed carriers.
- Will coordinate response to any emergency situation, which may arise. The ERT Coordinator/Hazardous Waste Director will coordinate these efforts.
- Responsible to interface with local first responders. Will give first responders as much pertinent information regarding the emergency as possible.
- Responsible for making sure the appropriate authorities are notified of the incident (i.e., 9-1-1, Spill Response Service, National Response Center, etc.).
- Employ an outside Hazardous Waste Reclamation, Clean Up and Response Company whenever necessary.

HAZARDOUS WASTE MANAGEMENT

JOB DESCRIPTION

Hazardous Waste Handler

KNOWLEDGE NEEDED

- Must be familiar with local, state and federal regulations pertaining to hazardous waste management.
- Must have good working knowledge of the hazards associated with the chemicals used at the facility and related processes.
- Must have good working knowledge of the personal protective equipment provided.
- Must have good working knowledge of who to contact and what to do in an emergency.
- Must have good working knowledge of the waste streams generated.
- Must have good working knowledge of labeling and grounding/bonding procedures.

TRAINING REQUIRED

- Initial and Annual Right to Know/Hazard Communication Training.
- Annual Hazardous Waste Management Training

DUTIES INCLUDE

- Responsible for properly labeling the waste containers.
- Responsible for placing waste in the correct containers.
- Responsible for transferring waste to storage containers.
- Responsible for wearing the required personal protective equipment when handling waste.
- Responsible for keeping waste containers closed when not in use.
- Responsible for grounding and bonding during the transfer of flammables.
- Responsible for noticing the ERT Coordinator or team member of any incident relating to hazardous waste. This must be done immediately.
- Hazardous waste handlers are not to clean up chemical spills. The ERT or out-sourced response/reclamation company may only do this.
- Designated handler is responsible for conducting weekly inspections of waste storage areas.
- Designated personnel are responsible for reviewing and signing manifests. Copies are then given to the Director for retention.

HAZARDOUS WASTE INSPECTION SIGN OFF

[illegible]

The following should be checked during the weekly inspections of hazardous waste storage containers/areas:

- Containers are closed
- Containers are properly labeled
- Flammable materials are properly grounded/bonded during transfer.
- Aisle space is adequate
- There is no leakage or container deterioration

Warning Protection Devices

TYPE	LOCATION	ACTIVATION	LIMITATIONS
Portable Fire Extinguishers	See facility map	Manual	Small fires
Sprinkler Systems	See facility map	Manual	
Alarm Systems	See facility map	Automatic	
Alarm Company Contracts			
Telephone			
Intercom			

Emergency Personal Protective Equipment Available

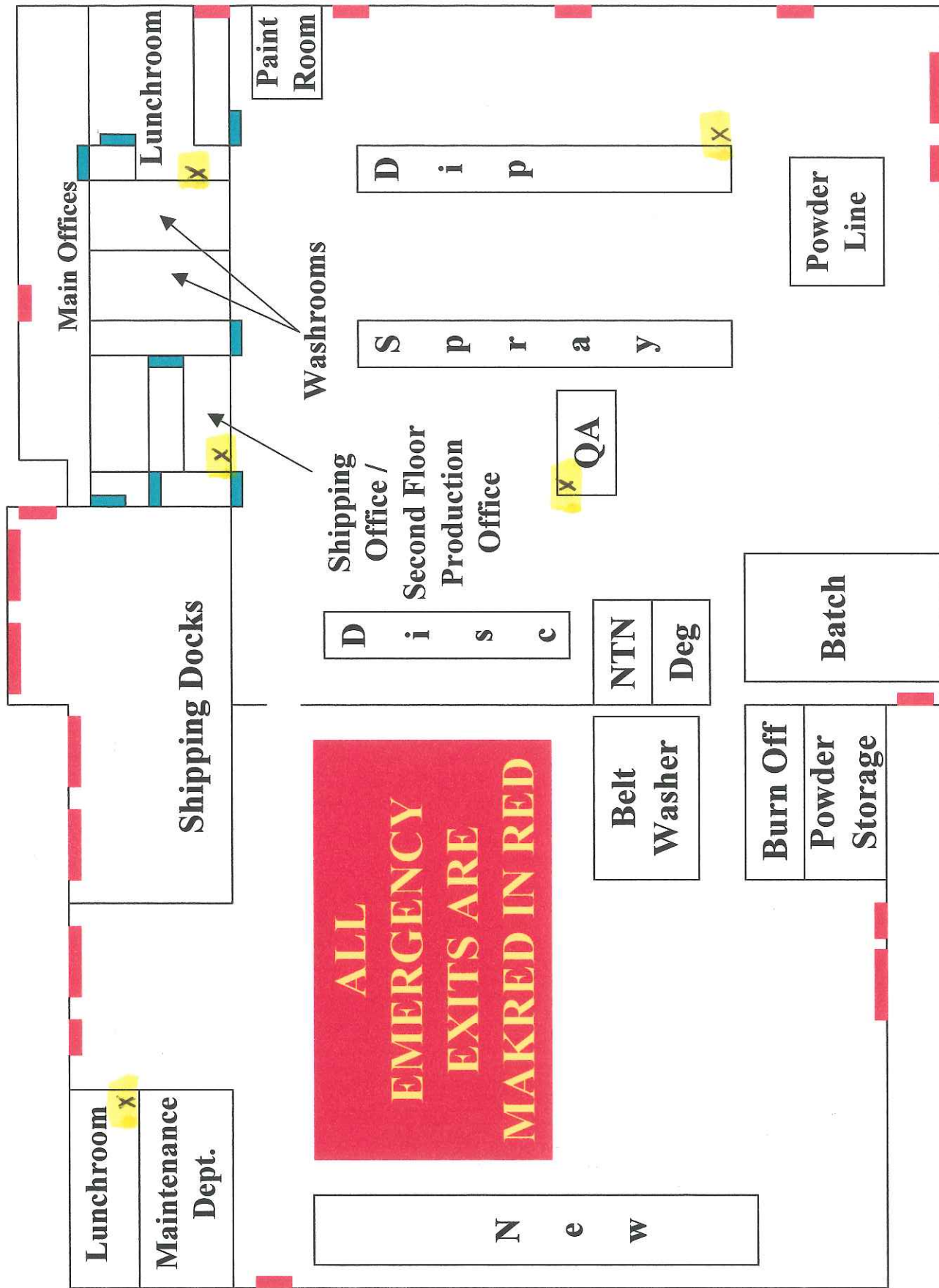
TYPE	LOCATION	MODEL	LIMITATIONS
Respirator	Spill Kit	O-V ½ mask	
		Dust Mask	
Gloves		Chemical resistant	
Apron		Chemical resistant	
Safety Glasses		Eye Protection	

Spill Kit Contents

TYPE	MODEL	LOCATION	LIMITATIONS
Spill Kit	Customized mobile cart	Inside paint storage room	

POSTING S-X

Acme Finishing's Evacuation Map



120 005 087 812

REFERENCE ITEM B



acme finishing company inc.

1595 Oakton Street, Elk Grove Village, IL 60007
(847) 640-7890 (800) 733-9229 fax (847) 640-0298

www.acmefinishing.com

HAZARDOUS WASTE GENERATOR LOCAL AUTHORITY NOTIFICATION

December 17, 2007

Elk Grove Fire Dept
Attn; Wilke Esconbo
901 Wellington Ave
Elk Grove Village, IL 60007
847-734-8000

PREPARED BY: United States Compliance Corporation

The United States Environmental Protection Agency and your local regulatory agency require all businesses that produce hazardous waste to notify local emergency response personnel. This notification is meant to establish cooperation in case of a fire or unplanned release of hazardous waste that may require your emergency services. So that you may be prepared to properly respond to an emergency at this site, we are enclosing a copy of their contingency plan. We appreciate your assistance in this matter and look forward to any comments you may have on this plan.

Best Regards,

United States Compliance Corporation



acme finishing company inc.
1595 Oakton Street, Elk Grove Village, IL 60007
(847) 640-7890 (800) 733-9229 fax (847) 640-0298
www.acmefinishing.com

HAZARDOUS WASTE GENERATOR LOCAL AUTHORITY NOTIFICATION

December 17, 2007

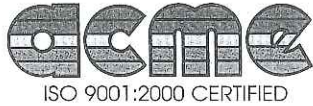
Elk Grove Police Dept
Attn; Steve Schmidt
901 Wellington Ave
Elk Grove Village , IL 60007
847-357-4120

PREPARED BY: United States Compliance Corporation

The United States Environmental Protection Agency and your local regulatory agency require all businesses that produce hazardous waste to notify local emergency response personnel. This notification is meant to establish cooperation in case of a fire or unplanned release of hazardous waste that may require your emergency services. So that you may be prepared to properly respond to an emergency at this site, we are enclosing a copy of their contingency plan. We appreciate your assistance in this matter and look forward to any comments you may have on this plan.

Best Regards,

United States Compliance Corporation



acme finishing company inc.
1595 Oakton Street, Elk Grove Village, IL 60007
(847) 640-7890 (800) 733-9229 fax (847) 640-0298
www.acmefinishing.com

HAZARDOUS WASTE GENERATOR LOCAL AUTHORITY NOTIFICATION

December 17, 2007

Alexian Bros. Hospital
Attn; Mary Ann Magnifico
800 Biesterfield Rd
Elk Grove Village , IL 60007
847-437-5500

PREPARED BY: United States Compliance Corporation

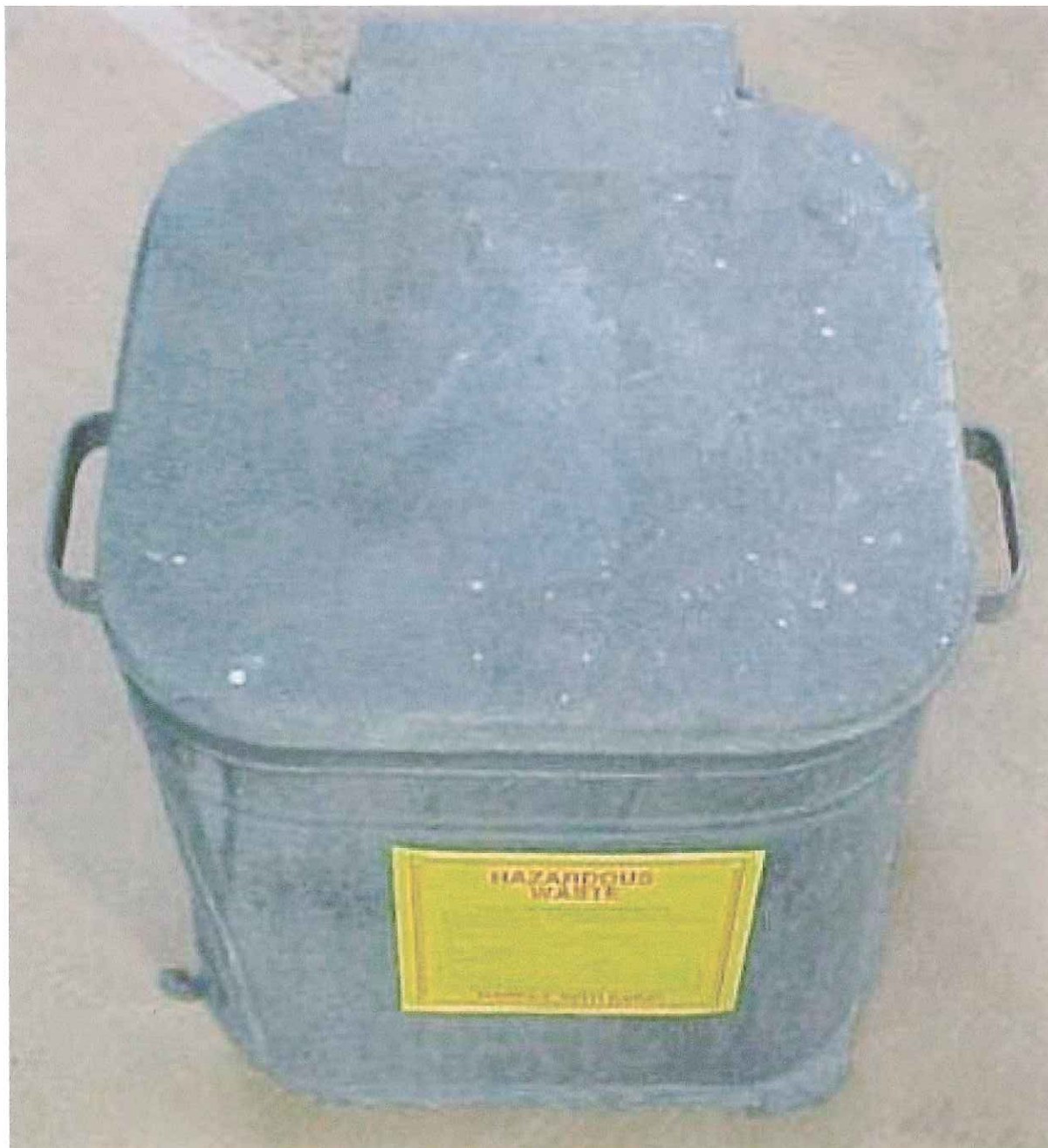
The United States Environmental Protection Agency and your local regulatory agency require all businesses that produce hazardous waste to notify local emergency response personnel. This notification is meant to establish cooperation in case of a fire or unplanned release of hazardous waste that may require your emergency services. So that you may be prepared to properly respond to an emergency at this site, we are enclosing a copy of their contingency plan. We appreciate your assistance in this matter and look forward to any comments you may have on this plan.

Best Regards,

United States Compliance Corporation

REFERENCE ITEM E

REFERENCE ITEM F





Steve Jayhan

REFERENCE ITEM D

From: Carlos Galindo [cgalindo@uscompliance.com]
Sent: Tuesday, December 18, 2007 9:04 AM
To: steve@acmefinishing.com
Subject: EPA Compliance

Steve,

I have attached copies of our 2004, 2005 and 2006 environmental calendars for your review. As you are aware these calendars illustrate our timetable for accomplishing important regulatory tasks. Such items as Hazardous Waste Training are included in the calendar and is done on an annual basis. I am only attaching three years prior but we have been servicing your site for 5 years and this has been standard practice.

please dont hesitate to let me know if you have any questions.

thank you,

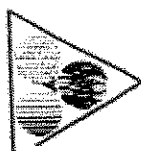
Carlos Galindo
Illinois Service Supervisor
US Compliance Corporation
(630) 321-1200
(630) 321-1274 Fax
cgalindo@uscompliance.com

TRAINING SCHEDULES

FOR 2004, 2005 + 2006

FROM US COMPLIANCE

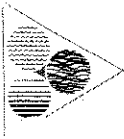
12/18/2007



Acme Finishing Company, Inc.

U.S. Compliance Environmental Calendar 2004

Month	Reports and Assessments	On-Site Recordkeeping	Inspections, Training and Testing
January	1/9 – Environmental Packet Due 1/30 – NESHAP Exceedance Report & Compliance Certification	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
February	SARA Tier II Assessment	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
March	3/1 – Tier II Deadline 3/1 – Semi-Annual Monitoring Report Due 3/1 – Hazardous Waste Biennial Report Due	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
April	4/27 - Discharge Monitoring Report	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Generator Status & Waste Stream Assessment Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review Biannual Storm Water Site Inspection
May	5/1 - Annual Emission Report & Compliance Certification Complete SARA 2003 Spreadsheet	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review Hazardous Waste Management Training
June	SARA Form R/A Assessment	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
July	7/1 - Form R/A Deadline 7/1 – P2 Report Deadline 7/30 - NESHAP Exceedance Report Due 7/31 – Storm Water Annual Report Due	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
August	Receive SARA 2003 Booklet	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
September	9/1 - Semi-Annual Monitoring Report Due Industrial Discharge Assessment	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	9/30 – Wastewater Testing Complete Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
October	10/27 - Discharge Monitoring Report Due	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review Biannual Storm Water Site Inspection
November	11/30 – ERMS Report Due Receive 2004 Environmental Packet	Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review
December		Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Manifest Review



Acme Finishing Company, Inc. 2005 Environmental Compliance Calendar

Month	Reports and Assessments	On-Site Record Keeping	Inspections, Training and Testing
January	1/7 – Environmental Packet Due 1/30 – NESHAP Exceedance Report & Compliance Certification	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
February	SARA Tier II Assessment Generator Status & Waste Stream Assessment	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
March	3/1 – Tier II Deadline 3/1 – Hazardous Waste Report Due 3/1 – Semi-Annual Monitoring Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Wastewater Testing Monitor Hoist Speed For Batch Vapor Degreaser
April	4/27 – Industrial Discharge Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Storm Water Site Inspection Monitor Hoist Speed For Batch Vapor Degreaser
May	Complete 2004 SARA Spreadsheet 5/1 - Annual Emission Report & Compliance Certification	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Hazardous Waste Management Training Monitor Hoist Speed For Batch Vapor Degreaser
June	SARA Form A/R Assessment	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Storm Water Annual Comprehensive Site Evaluation Monitor Hoist Speed For Batch Vapor Degreaser
July	7/1 – Form A/R Deadline 7/31 – Annual Storm Water Report 7/30 - NESHAP Exceedance Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Storm Water Annual Training Monitor Hoist Speed For Batch Vapor Degreaser
August		Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
September	Receive 2004 SARA Assessment 9/1 - Semi-Annual Monitoring Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Storm Water Site Inspection Wastewater Testing Monitor Hoist Speed For Batch Vapor Degreaser
October	10/27 – Industrial Discharge Report Due Receive 2005 Environmental Packet	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
November	11/30 – ERMS Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
December		Manifest Review Daily/Monthly Air Emissions Recordkeeping Daily Air Emissions Recordkeeping for Pyrolysis Furnaces	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser

Note: All events are subject to change. Agency reporting and U.S. Compliance deadlines are in **boldface**.



Acme Finishing Company, Inc. 2006 Environmental Compliance Calendar

Month	Reports and Assessments	On-Site Record Keeping	Inspections, Training and Testing
January	1/6 – Environmental Packet Due 1/30 – NESHAP Exceedance Report & Compliance Certification	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
February	SARA Tier II Assessment Generator Status & Waste Stream Assessment 2/1 IL Non Hazardous Special Waste Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
March	3/1 – Tier II Deadline 3/1 – Hazardous Waste Report Due 3/1 – Semi-Annual Monitoring Report Due (July-December)	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Wastewater Testing Monitor Hoist Speed For Batch Vapor Degreaser
April	4/27 – Industrial Discharge Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Storm Water Site Inspection Monitor Hoist Speed For Batch Vapor Degreaser
May	5/1 - Annual Emission Report & Compliance Certification Complete 2005 SARA Spreadsheet	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser Hazardous Waste Management Training
June	SARA Form A/R Assessment	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Storm Water Annual Comprehensive Site Evaluation Monitor Hoist Speed For Batch Vapor Degreaser
July	7/1 – Form A/R Deadline 7/30 - NESHAP Exceedance Report Due 7/31 – Annual Storm Water Report 7/31 – Industrial Discharge Permit Renewal Application Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Storm Water Annual Training Monitor Hoist Speed For Batch Vapor Degreaser
August		Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
September	9/1 - Semi-Annual Monitoring Report Due (January-June) Receive 2005 SARA Assessment	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Storm Water Site Inspection Wastewater Testing Monitor Hoist Speed For Batch Vapor Degreaser
October	10/27 – Industrial Discharge Report Due Receive 2006 Environmental Packet	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
November	11/30 – ERMS Report Due	Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser
December		Manifest Review Daily/Monthly Air Emissions Recordkeeping Pyrolysis Furnace Temperature Monitoring	Weekly Hazardous Waste Inspections Monitor Hoist Speed For Batch Vapor Degreaser

Note: All events are subject to change. Agency reporting and U.S. Compliance deadlines are in **boldface**.



United States Compliance Corporation Industrial EHS Compliance Site Visit Report

Date: 10/19/07

Site Name: Acme Furnish

JSCC Advisor: Carlos Acuña

Contacted: Al

I. Primary Visit Accomplishments

1. Site Inspection:

Complete: ☒ Yes ☐ No

*See Reverse Side For Details

2. Training:

Complete: ☒ Yes ☐ No

Topic: Completed three sessions of Hazardous waste training for all employees involved in the accumulation, manifest or inspection of hazardous waste.

Comments: - copies of sign in sheets were placed in the binder under "Waste management" and copies were given to Al and Dennis.

3. Safety Committee/ERT Meeting:

Complete: ☐ Yes ☒ No

Comments:

4. Program/Policy Development & Updating:

Subject/Comments:

Delivered the updated Respiratory protection program. This new version only states the systems used here to fit test. He is a rough create version.

Delivered the new PPE program and JHAs. These should be reviewed by the staff. Once these are reviewed then they will be edited by USCC.

5. Environmental/Industrial Hygiene:

Comments:

6. Other:

II. Key Priorities/Action Item

1. Review JHAs
2. Sign in sheets of focus to EPA
- 3.

III. U.S. Compliance Follow-up

- 1.
- 2.
- 3.
- 4.
- 5.

IV. Visit Wrap-up

1. Next Visit Agenda:

- ☐
-
- ☐
-
- ☐
-
- ☐
-
- ☐
-
- ☐

2. Client Review

Signature:

Date:

10-19-07

Acme

10/19/07

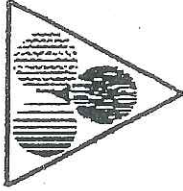
V Site Inspection Comments - Site/Client:

Welding area in front of lunchroom.

- provide welding screens for areas in front of lunchroom employees are being exposed to welding arc
- Employee welding is using cardboard as protection shield be a non-combustible material

Client Initials:

REFERENCE Item D



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: Celso

TOPIC(S) COVERED:

Hazardous Waste training for employees working with hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspection and spill response.

NAME

Carlos Martinez

Silvia Luna

Jesús Ariza

Armando Uicavor

Patricia Ramos

Melito Ramirez

ERIK CAMPECHANO

Josefina Jimenez

Maria Estrada

Amalia Moran

Maira Pineda

Bernardo Peraza

Julio Ramirez

SIGNATURE

Carlos Martinez

Silvia Luna

Jesús Ariza

Armando Uicavor

Patricia R.

Melito Ramirez

ERIK CAMPECHANO

Josefina Jimenez

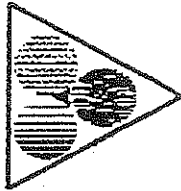
Maria Estrada

Amalia Moran

Maira Pineda

Bernardo Peraza

Julio Ramirez



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: Cal [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees working with hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspection and spill response.

NAME

Jean Rendon

Domingo Arroyo

Susana Cervantes

Socorro Suarez

Fatima Angel

Olivia MORGANO

Ariana Moreno

Juan Teodoro

Juan Lopez

~~[Signature]~~

Concepcion Bala

Jorge Gomez

Martina Morales

SIGNATURE

Jean Rendon

Domingo Arroyo

Susana Cervantes

Socorro Suarez

Fatima Angel

~~[Signature]~~

Ariana Moreno

~~[Signature]~~

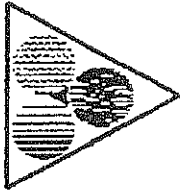
Juan Lopez

~~[Signature]~~

Concepcion Bala

[Signature]

Martina Morales



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: Cal [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees working with hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspections and spill response.

NAME

SIGNATURE

Pablo Flores

Pablo Flores

PATRICI CRISTOBAL

Patricia Cristobal

ARCADIO CAMPECHANO

ARCADIO

Jesus MARTINEZ JR

MARTINEZ

Pedro Robles

Pedro Robles

JOSÉ MEJIA

JOSE MEJIA

Jesse Narza

Jesse Narza

Rodrigo Montalvo

Rodrigo Montalvo

Roberto Paula

Roberto Paula

Jose Gonzalez

Jose Gonzalez

Maria Cortez

Maria Cortez

Ivan Carrera

Ivan Carrera

Ricardo Rivera

Maria Kasales

Angel G. Zuniga

Angel G. Zuniga

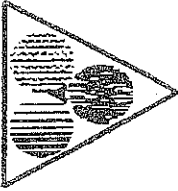
Helpe Hernandez

Helpe Hernandez

Rosa Ocampo

Victor Rios
Rosa Ocampo

Petronila Zuniga
David Carrera



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: Carl [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees working with hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspections and spill response.

NAME

SIGNATURE

Oscar Rodriguez

[Signature]

BILL GEDWIN

[Signature]

RON GIBSON

[Signature]

Felix Villagran

Felix Villagran

Roberto Lopez

Roberto Lopez

Tom Kotarba

TOM KOTARBA

Domingo Boneta

[Signature]

Barbara Heredia

Barbara Heredia

Danyli Lizama

Danyli Lizama

M. J.

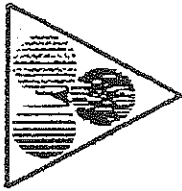
MARIA JARAMILLO

M. A. C.

Maria Anna Cantan

Alejandra Rodriguez

[Signature]



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees covering the hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspection and spill response.

NAME

SIGNATURE

Sergio Gomez

[Signature]

FIDENCIA BARR

Epi fania Albitas

Agustin Delgado

Carlos Aguado

Alejandro Sanchez

[Signature]

Juanito Leonile

[Signature]

RODRIGO ALVARO

Claudia Perez

Francisco Rivera

[Signature]

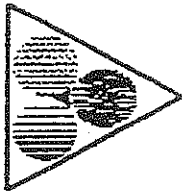
Emilio Ruiz

[Signature]

Juan Morales

Denia Medel

Cristal Valdez



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: Cal [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees working with hazardous waste. Review of waste codes, labeling, storage, manifest, weekly inspections and spill response.

NAME

SIGNATURE

Jose Ramirez

[Signature]

Helario Hernandez

Helario Hernandez

ZUCU ALVARADO

ZUCU ALVARADO

Angel Salgado

Angel Salgado

Pedro LIZAMA

Pedro Lizama

Sergio Benitez

Sergio Benitez

DEIBI GONZALEZ

[Signature]

Bernardo Pumangasa

B. La Puma

Gerardo ASCENCIO

Gerardo ASCENCIO

JOSE A. CRUZ

[Signature]

Rupe Cuellar

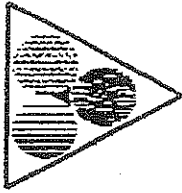
Rupe Cuellar

ROBERTO VALENTIN

[Signature]

Hector Rosales

[Signature]



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: Carl [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees working with hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspection and spill response.

NAME

SIGNATURE

Juan A Perez

Juan A Perez

William Brocho

William Brocho

José V. Gonzalez

[Signature]

Silkeis D

Coroniza

Humberto Solis

Humberto Solis

FRANCISCO MONTALVO

[Signature]

ESTEBAN ERIZ

[Signature]

Candida Jimenez

Candida M. Jimenez

Orma Martinez

[Signature]

Miguel A. Tecuapacho

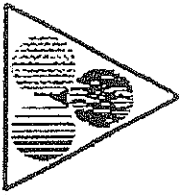
[Signature]

Claudia Soto

Claudia Soto

Alma Rosales

Alma Rosales



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Arme Finishing

DATE: 10/19/07

INSTRUCTOR: [Signature]

TOPIC(S) COVERED:

Hazardous Waste training for employees working with the hazardous waste. Review of waste codes, labeling, spilling, manifest, weekly inspection and spill response.

NAME

KEVIN OROPEZA

SIGNATURE

[Signature]

Gabriela López

Gabriela López

Teresa López

Teresa López

Gabriel Flores

[Signature]

Antonio Mondéz

[Signature]

ANTONIO MONDEZ

ANTONIO MONDEZ

Julio Pacheco

[Signature]

Calisto Guevara

Calisto Guevara

Javier Taxis

[Signature]

Javier Vega

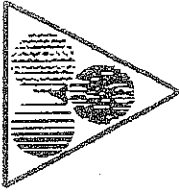
Javier Vega

Maria Hernandez

Maria Hernandez

Jaime Martinez

[Signature]



EMPLOYEE SAFETY TRAINING RECORD

COMPANY: Acme Finishing

DATE: 10/19/07

INSTRUCTOR: [Signature]

TOPIC(S) COVERED:

Hazardous waste training for employees working with
hazardous waste. Review of waste codes, labeling, spilling
manifest, weekly inspections and spill response.

NAME

[Signature]
BALTAZAR MARTINEZ

Jose Luis Trujillo

Patricio Rolando Ramos

Santiago Cardona

Gerardo Harrojo

Arturo Cortez

SIGNATURE

[Signature]

BALTAZAR MARTINEZ

Jose Luis Trujillo

Patricio Rolando RAMOS

[Signature]

Gerardo HARROJO

Arturo Cortez



Illinois Department of Transportation

Todd Hirstein
Haz. Material Compliance Officer

Division of Traffic Safety
3215 Executive Park Drive
Springfield, Illinois 62794-9212
Tele. 217/785-1181 Fax 782-9159
hirsteint@dot.il.gov



REFERENCE ITEM D



United States Compliance Corporation

DOT Hazmat & Hazardous Waste Management (RCRA) Training

Instructor: Rob S. Gaudin Date: 10-20-05 Location: Acme Finishing

Full Name (Please Print)	Signature	Company	Address/Phone	Hazmat	RCRA
Arnon Goodwin	<i>Arnon Gd.</i>	Acme finishing	1595 Oakton St 847640-7890	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Bill Gaudin	<i>Bill Gaudin</i>	Acme Finishing	" "	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Don Gibson	<i>Don Gibson</i>	Acme Finishing	" "	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Domingo Boneta	<i>Domingo Boneta</i>	Acme Finishing	" "	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Abel Leon	<i>Abel Leon</i>	Acme Finishing	" "	<input checked="" type="checkbox"/>	<input type="checkbox"/>
				<input type="checkbox"/>	<input type="checkbox"/>



acme finishing company inc.
1595 Oakton Street, Elmhurst, Illinois 60120

(847) 640-7890 (800) 733-9229 Fax: (847) 640-0298

FACSIMILE COVER LETTER

Phone: (847) 640-7890 Fax: (847) 640-0298

Number of pages, including this cover sheet: 3

Date: 10/14/05

To: Name KEN KREISER

Dept: _____

Company: U.S. COMPLIANCE

Fax Number: 952-252-3001

From: DENNIS WALTERS

Comments:

Re. D.O.T. SECURITY PLAN CONTRACT

SPECIAL PROJECT CONTRACT

UNITED STATES COMPLIANCE CORPORATION

The undersigned parties do hereby agree and covenant the following:

I.

SCOPE OF SERVICES

U.S. Compliance Corporation, as an independent contractor, hereby agrees to provide safety and environmental management, consultation, and administrative services in coordination with the on-site personnel of the undersigned client.

U.S. Compliance Corporation's duties do not include supervising the undersigned client's employees, agents, or subcontractors commenting on or overseeing or providing the means or methods of their work, unless U.S. Compliance Corporation has agreed to do so in writing. Further, U.S. Compliance Corporation will not be responsible for the failure of the undersigned client's employees, agents or subcontractors to perform in accordance with their obligations, and the providing of services by U.S. Compliance Corporation will not relieve others of their responsibilities to the undersigned client or to others. U.S. Compliance Corporation is not responsible for the attendance or participation of the undersigned client's employees at any U.S. Compliance Corporation provided training sessions.

Scope of Service:

Creation of a DOT Site Security Plan per 49 CFR Part 172.800 requirements
Update Contingency Plan with security requirements
Assessment of security risk control points & prevention strategies

U.S. Compliance Corporation agrees to assist the undersigned client in complying with certain federal, states and local government regulations. The undersigned client further agrees that U.S. Compliance Corporation is not responsible, in any capacity, for failure to comply with any of the aforementioned regulations or for damages or penalties of any type sought or assessed, including attorney's fees and expenses, from any source.

II.

CONDUCT OF WORK AND DEFENSE, INDEMNIFICATION AND HOLD HARMLESS

The undersigned client agrees to compensate U.S. Compliance Corporation for any reasonable fees and expense, including reasonable attorney fees, arising out of a legal action relating to any services provided by U.S. Compliance Corporation, to which U.S. Compliance Corporation is not a party.

The undersigned client agrees that if it brings a claim against U.S. Compliance Corporation that is ultimately resolved in favor of U.S. Compliance Corporation, then the undersigned client will reimburse U.S. Compliance Corporation for all costs related to the defense of the claim, including but not limited to, reasonable attorney and expert witness fees.

The undersigned client shall defend, indemnify and hold harmless U.S. Compliance Corporation and any and all of its shareholders, employees, officers, agents, subcontractors or consultants (the "indemnities") from any claims, demands, losses, damages, costs, charges, suits, fees, penalties and/or expenses of every nature and description (hereinafter "claims") (whether direct or indirect, active or passive, concerning, arising out of or related to this contract or the performance of the work under this Contract or for claims for which U.S. Compliance Corporation may be or may be claimed to liable, including without limitation for negligence) including without limitation injuries to any persons (including the undersigned client's employees) and damages to any property. The obligations under this section will not be limited in any way by limitations on the amount or type of damages,

compensation, insurance, or benefits payable by or for the undersigned client or workers' compensation acts, disability acts, or other employee benefit

III.

REPORTS AND WORK OF UNITED STATES COMPLIANCE CORPORATION

U.S. Compliance Corporation's reports, notes, calculations, and other documents are instruments of our service. These reports are for the undersigned client's use only for the purposes disclosed to U.S. Compliance Corporation. The undersigned client may not transfer U.S. Compliance Corporation reports to others or use them for a purpose for which they were not prepared without U.S. Compliance Corporation's written consent. At the undersigned client's request U.S. Compliance Corporation will provide copies of its reports or letters of reliance, but only if the recipients agree to be bound by the terms of this agreement.

IV.

NO-SOLICITATION OF UNITED STATES COMPLIANCE CORPORATION'S EMPLOYEES

The undersigned client acknowledges that the employees of the U.S. Compliance Corporation are unique and highly valued assets of the U.S. Compliance Corporation. In recognition of that fact, the undersigned client agrees that it will not, during the term of the Service Contract or for a period of one (1) year after termination of this Service Contract, directly or indirectly, either as an individual, employee, consultant, independent contractor, principal, agent, owner, partner, shareholder, member, corporation, or otherwise, solicit or attempt to solicit for any of the U.S. Compliance Corporation's employees for the purpose of employment or inducing them to leave their employment with U.S. Compliance Corporation.

In the event of an actual or threatened breach by the undersigned client of the immediately preceding paragraph of this Contract, the parties agree that, in addition to any other right or remedy available U.S. Compliance Corporation shall be entitled to immediately apply for and obtain a restraining order and/or injunction restraining and enjoining the undersigned client from violating the immediately previous paragraph, such injunction being without bond or surety. The undersigned client waives any requirement of proof that such breach or threatened breach will cause irreparable injury to U.S. Compliance Corporation or that there is no adequate remedy at law, it being expressly agreed by the parties that such breach will cause irreparable harm to U.S. Compliance Corporation for which there is no adequate remedy at law.

The undersigned client will pay U.S. Compliance Corporation's costs and expenses, including attorney's fees, costs and disbursements incurred by U.S. Compliance Corporation in connection with the enforcement of the paragraphs in this section, and in connection with any action, suit and/or claim related hereto irrespective of whether a suit is filed.

V.

FEES, EXPENSES, PAYMENT AND BILLING

U.S. Compliance Corporation and the undersigned client agree to the following service fee:

\$ 500.00

Start Date: October 15, 2005

The undersigned client agrees that any expenses, including, but not limited to, travel, lodging, subsistence, communications costs, and any other agreed upon expense, are the responsibility of the undersigned client. The undersigned client agrees that payment for any such expenses is due and payable upon presentation of the expense to the client.

The undersigned client further agrees to pay interest on unpaid balances beginning thirty (30) days after the invoice date at a rate of 1.5% per month, but such interest not to exceed the maximum rate allowed by law.

The undersigned client agrees to notify U.S. Compliance Corporation of any billing dispute within fifteen (15) days of the invoice date. The undersigned client agrees that any invoice amount not disputed within fifteen (15) days of the invoice date shall be considered a final and non-negotiable amount.

The undersigned client agrees that failure to pay any amount due within thirty (30) days of the invoice date may be considered a material breach of contract and U.S. Compliance Corporation, at its option, may cease to perform all work without liability to the client or others. Further, U.S. Compliance Corporation may retain all reports and work not delivered to the undersigned

client and all reports and other work performed (and not paid for) shall be immediately returned to U.S. Compliance Corporation. Further, the undersigned client, without written permission of U.S. Compliance Corporation, may not use reports and any other work for any purpose whatsoever until all the invoices associated with the reports or work has been

U.S. Compliance Corporation is required to collect payment owed by the undersigned client; the undersigned client agrees to pay the collection expenses, including reasonable attorney fees and costs incurred by U.S. Compliance Corporation.

VI.

MISCELLANEOUS

U.S. Compliance Corporation and the undersigned client agree that neither party will assign this Contract without the express written consent of the other party. However, U.S. Compliance Corporation reserves the right to subcontract work, as it deems necessary.

U.S. Compliance Corporation and the undersigned client agree that this agreement represents the entire Contract between the parties, and it supercedes all prior agreements, either written or oral. This Contract may only be modified in writing that makes specific reference to the provision being modified.

The laws of the State of Minnesota shall govern the validity, enforceability, terms, construction and interpretation of this Contract.

IN WITNESS WHEREOF, the parties have dated and signed this agreement.

CONTRACT ACCEPTANCE:

DATED: _____, 2005

DATED: Oct. 14 2005

In the event that any provision under this Contract is invalid or unenforceable under the application of law that shall not affect the validity or enforceability of the remaining provisions.

To the extent that any provision of this Contract is unenforceable because it is over broad, that provision shall be limited to the extent required by applicable law and enforced as so limited.

The title of the various paragraphs of this Contract are solely for the convenience of the parties, and will not be used to explain, modify, amplify or aid in the interpretation of the provisions of this Contract.

The terms of this Contract supercede and terminate all prior oral and written contracts/agreements and communications between the parties related to the subject matter of this Contract.

The forum for any dispute arising out of or related to this contract shall be venued exclusively in the State of Minnesota. The undersigned client does hereby agree and submit to personal jurisdiction in the State of Minnesota for the purposes of any suit, proceeding or hearing brought to enforce or construe the terms of this Contract or to resolve any dispute or controversy arising under, as a result of, or in connection with this Contract or the parties' relationship. The undersigned client waives any right to contest such venue and jurisdiction and any claims that such venue and jurisdiction are invalid.

U.S. COMPLIANCE CORPORATION

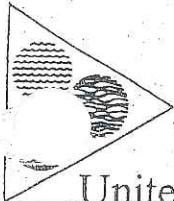
By _____

Its _____

ACME FINISHING COMPANY

By Dennis Walters

Its PRESIDENT



United States Compliance

REFERENCE ITEM D

ERT Safety Training Record

Company: ACME Finishing Subject: ERT MTG

Description of Subject Material: security measures for shippers of hazardous materials

Trainer's Signature: Vern Plummer Date: Nov. 5, 2001

Employee Print Name:

Signature:

EDWARD J. GRAY

AL COLELLA

STANLEY STAYTON

DAN COLLINS

MICHAEL MELONDEZ

GEORGE ANDERSON

DAVID RICHARDS

BILL LEON

Edward J. Gray

Al Colella

Stanley Stayton

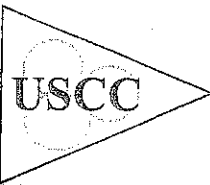
Dan Collins

Michael Melendez

George Anderson

David Richards

Bill Leon



ANNUAL HAZARDOUS MATERIALS & WASTE
MANAGEMENT TRAINING

COMPANY: ACUE Finishing

- | | | |
|--|---------------------------|--|
| 1. Waste Streams and Codes | 6. Storage Limits | 12. Shutdown Procedure |
| 2. Hazards Associated with
Materials and Wastes | 7. Satellite Accumulation | 13. Alarms and Communication |
| 3. Handling Materials (PPE) | 8. Shipment Preparation | 14. Facility Evacuation |
| 4. Labeling | 9. Manifests | 15. Review of Individual
Job Descriptions |
| 5. Containers | 10. Record Keeping | 16. Question and Answer |
| | 11. ERT/Contingency Plan | |

INSTRUCTOR: Tatiana Velander

DATE: 11/13/03

NAME

Domingo Boneta

Felix V.

Canon Godwin

Jose Ramirez

Oscar Rodriguez

SIGNATURE

[Signature]

[Signature]

[Signature]

[Signature]



United States Compliance Corporation
301 Carlson Parkway • Suite 200 • Minnetonka, MN 55305 • Phone 952.252.3000 • Fax 952.252.3001
www.uscompliance.com

ACME FINISHING COMPANY, INC.
JOB DESCRIPTIONS

TABLE OF CONTENTS

REFERENCE ITEM D

Job Description	Revision	Date
President	A	11-20-00
Vice President of Sales	A	11-27-00
Plant Manager	A	11-20-00
Administration Manager	A	11-28-00
Sales Manager	A	11-24-00
Quality Assurance Manager	A	11-20-00
Customer Service Manager	A	11-8-00
Production Line Supervisor	A	11-8-00
Batch Supervisor	A	11-8-00
Shipping/Receiving Manager	A	11-24-00
Office Manager	A	11-28-00
Maintenance Manager	B	12-17-07
Receiving Inspector	A	11-27-00
Quality Assurance Assistant	A	11-28-00
Receptionist	A	11-27-00
Sales Representative	A	11-25-00
Customer Service/Inside Sales Representative	A	11-8-00
Shipping/Receiving Clerk	A	11-25-00
Forklift Operator	A	11-25-00
Line Group Leader	A	11-22-00
Lead Hanger	A	11-8-00
Line Lead Sprayer	A	11-24-00
Line Lead Packer/Inspector	A	11-15-00
Part Hanger	A	11-8-00
Line Powder Sprayer	A	11-13-00
Line Liquid Sprayer	A	11-13-00
Line Packer/Inspector	A	11-15-00
Batch Group Leader	A	11-22-00
Batch Lead Packer/Inspector	A	11-15-00
Batch Packer/Inspector	A	11-15-00
Batch Liquid Sprayer	A	11-13-00
Batch Powder Sprayer	A	11-13-00
Maintenance Technician	B	12-17-07
Burn Off/Stripping Leadperson	A	11-25-00
Belt Wash Leadperson	A	11-25-00
Belt Wash Loader	A	11-20-00
Belt Wash Unloader	A	11-20-00
Degreaser Operator	A	11-25-00



Prepared By:

Al Colby

Date:

12-17-07

Approved By:

Steve Payne

Date:

12/17/07

MAINTENANCE TECHNICIAN

INTRODUCTION

Manages Technician activities of Acme Finishing by performing the following duties personally or through subordinate supervisors. Installs, maintains, and repairs machinery, equipment, physical structures, and pipe and electrical systems in Acme Finishing by performing the following duties.

GENERAL

1. Essential Duties and Responsibilities

- 1.1 The basic function of the Maintenance Technician is to perform maintenance activities to achieve Acme Finishing maintenance objectives.
- 1.2 Other basic functions include:
 - 1.2.1 Visually inspects and tests machinery and equipment.
 - 1.2.2 Listens for unusual sounds from machines or equipment to detect malfunction and discusses machine operation variations with supervisor or other maintenance workers to diagnose problem or repair machine.
 - 1.2.3 Dismantles defective machines and equipment and installs new or repaired parts.
 - 1.2.4 Cleans and lubricates shafts, bearings, gears, and other parts of machinery.
 - 1.2.5 Installs and repairs electrical apparatus, such as transformers and wiring, and electrical and electronic components of machinery and equipment.
 - 1.2.6 Lays out, assembles, installs, and maintains pipe systems and related hydraulic and pneumatic equipment, and repairs and replaces gauges, valves, pressure regulators, and related equipment.
 - 1.2.7 Repairs and maintains physical structure of establishment.
 - 1.2.8 Installs, programs, or repairs automated machinery and equipment such as robots or programmable controllers.
 - 1.2.9 Operates cutting torch or welding equipment to cut or join metal parts.
 - 1.2.10 Fabricates and repairs counters, benches, partitions, and other wooden structures.
 - 1.2.11 Follow all rules and procedures to ensure that Acme Finishing is in compliance with all State and Federal Environmental Protection Agency rules as they pertain to the handling, storage, and disposal of hazardous waste.
 - 1.2.12 May perform other duties as assigned or directed by the Maintenance Manager.
- 1.3 The Maintenance Technician is responsible for performing maintenance activities to achieve Acme Finishing maintenance objective. He/she must ensure that:
 - 1.3.1 Production equipment is repaired and in working condition.
 - 1.3.2 Preventive maintenance activities are performed and maintained.
 - 1.3.3 New equipment is installed and functioning properly.
 - 1.3.4 Maintenance complaints are performed on production equipment effectively and are handled in timely manner.

Qualifications

MAINTENANCE TECHNICIAN (CONT.)

- 2.1 To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

3. Education and/or Experience

- 3.1 One-year certificate from college or technical school; or three to six months related experience and/or training; or equivalent combination of education and experience.

4. Language Skills

- 4.1 Ability to read and interpret documents such as safety rules, operating and maintenance instructions, and procedure manuals. Ability to write routine reports and correspondence. Ability to speak effectively before employees of Acme Finishing.

5. Mathematical Skills

- 5.1 Ability to add, subtract, multiply, and divide in all units of measure, using whole numbers, common fractions, and decimals. Ability to compute rate, ratio, and percent.

6. Reasoning Ability

- 6.1 Ability to apply common sense understanding to carry out instructions furnished in written, oral, or diagram form. Ability to deal with problems involving several concrete variables in standardized situations.

7. Physical Demands

- 7.1 The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.
- 7.2 While performing the duties of this job, the employee is occasionally required to stand; walk; sit; use hands to finger, handle, or feel; reach with hands and arms; climb or balance; stoop, kneel, crouch, or crawl; talk or hear; elevated heights; and taste or smell. The employee must occasionally lift and/or move up to 50 pounds. Specific vision abilities required by this job include close vision, distance vision, color vision, and ability to adjust focus.

8. Work Environment

- 8.1 The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

MAINTENANCE TECHNICIAN (CONT.)

- 8.2 While performing the duties of this job, the employee is occasionally exposed to moving mechanical parts, fumes of airborne particles, toxic or caustic chemicals, and extreme heat. The noise level in the work environment is usually moderate

9. Reporting Relationship

- 9.1 The Maintenance Technician reports directly to the Maintenance Manager.



Prepared By: *[Signature]*

Date: 12-17-07

Approved By: *[Signature]*

Date: 12/17/07

MAINTENANCE MANAGER

INTRODUCTION

Manages maintenance activities of Acme Finishing by performing the following duties personally or through subordinate supervisors.

GENERAL

1. Essential Duties and Responsibilities

- 1.1 The basic function of the Maintenance Manager is to lead the people in the direction to achieve Acme Finishing maintenance objectives.
- 1.2 Other basic functions include:
 - 1.2.1 Schedules repair, maintenance, and installation of machines, tools, and equipment to ensure continuous production operations.
 - 1.2.2 Directs maintenance activities on utility systems to provide continuous supply of heat, electric powder, gas, or air required for operations.
 - 1.2.3 Develops preventive maintenance program in conjunction with maintenance staff.
 - 1.2.4 Inspects operating machines and equipment for conformance with operational standards.
 - 1.2.5 Reviews new product plans and discusses equipment needs and modifications with management.
 - 1.2.6 Requisitions tools, equipment, and supplies required for operations.
 - 1.2.7 Confers with management and quality assurance personnel to resolve maintenance problems and recommend measures to improve operations and conditions of machines and equipment.
 - 1.2.8 The proper disposal of all waste materials, both hazardous and non-hazardous. Ensure that Acme Finishing is in compliance with all State and Federal EPA rules as they pertain to the handling, storage, and disposal of hazardous waste.
 - 1.2.9 Implement the Contingency and Emergency Plan in the event of an emergency.
 - 1.2.10 The Maintenance Manager has the authority to evaluate, promote, demote, terminate, counsel and train any personnel in Acme Finishing's Maintenance Department.
- 1.3 The Maintenance Manager is responsible to lead Acme Finishing to achieving Acme Finishing maintenance objective. He/she must ensure that:
 - 1.3.1 Acme Finishing equipment is well maintained and in working condition.
 - 1.3.2 Acme Finishing preventive maintenance program is implemented and maintained.
 - 1.3.3 The allocation of new equipment is researched.
 - 1.3.4 Maintenance complaints on production equipment are handled in timely manner.

2. Supervisory Responsibilities

MAINTENANCE MANAGER (CONT.)

- 2.1 Directly supervises employees in the Maintenance Department. Carries out supervisory responsibilities in accordance with Acme Finishing's policies and applicable laws. Responsibilities include interviewing, hiring, and training employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.
- 2.2 Directly supervises two employees in the Maintenance Department. Carries out supervisory responsibilities in accordance with Acme Finishing's policies and applicable laws. Responsibilities include interviewing, hiring, and training employees; planning, assigning, and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems.

3. Qualifications

- 3.1 To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

4. Education and/or Experience

- 4.1 Associates degree (A.A.) or equivalent from two-year college or technical school; or six months of one year related experience and/or training; or equivalent combination of education and experience.

5. Language Skills

- 5.1 Ability to read, analyze, and interpret general business periodicals, professional journals, technical procedures, or governmental regulations. Ability to write reports, business correspondence, and procedure manuals. Ability to effectively present information and respond to questions from groups of managers, clients, customers, and the general public.

6. Mathematical Skills

- 6.1 Ability to work with mathematical concepts such as probability and statistical inference, and fundamentals of plane and solid geometry and trigonometry. Ability to apply concepts such as fractions, percentages, ratios, and proportions to practical situations.

7. Reasoning Ability

- 7.1 Ability to solve practical problems and deal with a variety of concrete variables in situations where only limited standardization exists. Ability to interpret a variety of instructions furnished in written, oral, diagram, or schedule form.

8. Physical Demands

MAINTENANCE MANAGER (CONT.)

- 8.1 The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.
- 8.2 While performing the duties of this job, the employee is occasionally required to stand; walk; sit; use hands to finger, handle, or feel; reach with hands and arms; climb or balance; stoop, kneel, crouch, or crawl; talk or hear; and taste or smell. The employee must occasionally lift and/or move up to 50 pounds. Specific vision abilities required by this job include close vision, distance vision, color vision, and ability to adjust focus.

9. Work Environment

- 9.1 The work environment characteristics described here are representative of those an employee encounters while performing the essential functions of this job. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.
- 9.2 While performing the duties of this job, the employee is occasionally exposed to moving mechanical parts, fumes of airborne particles, toxic or caustic chemicals, and extreme heat and cold. The noise level in the work environment is usually moderate.

10. Reporting Relationship

- 10.1 The Maintenance Manager reports directly to the Plant Manager.
- 10.2 The Maintenance Technicians report directly to the Maintenance Manager.



Prepared By:

[Signature]

Date:

12-17-07

Approved By:

[Signature]

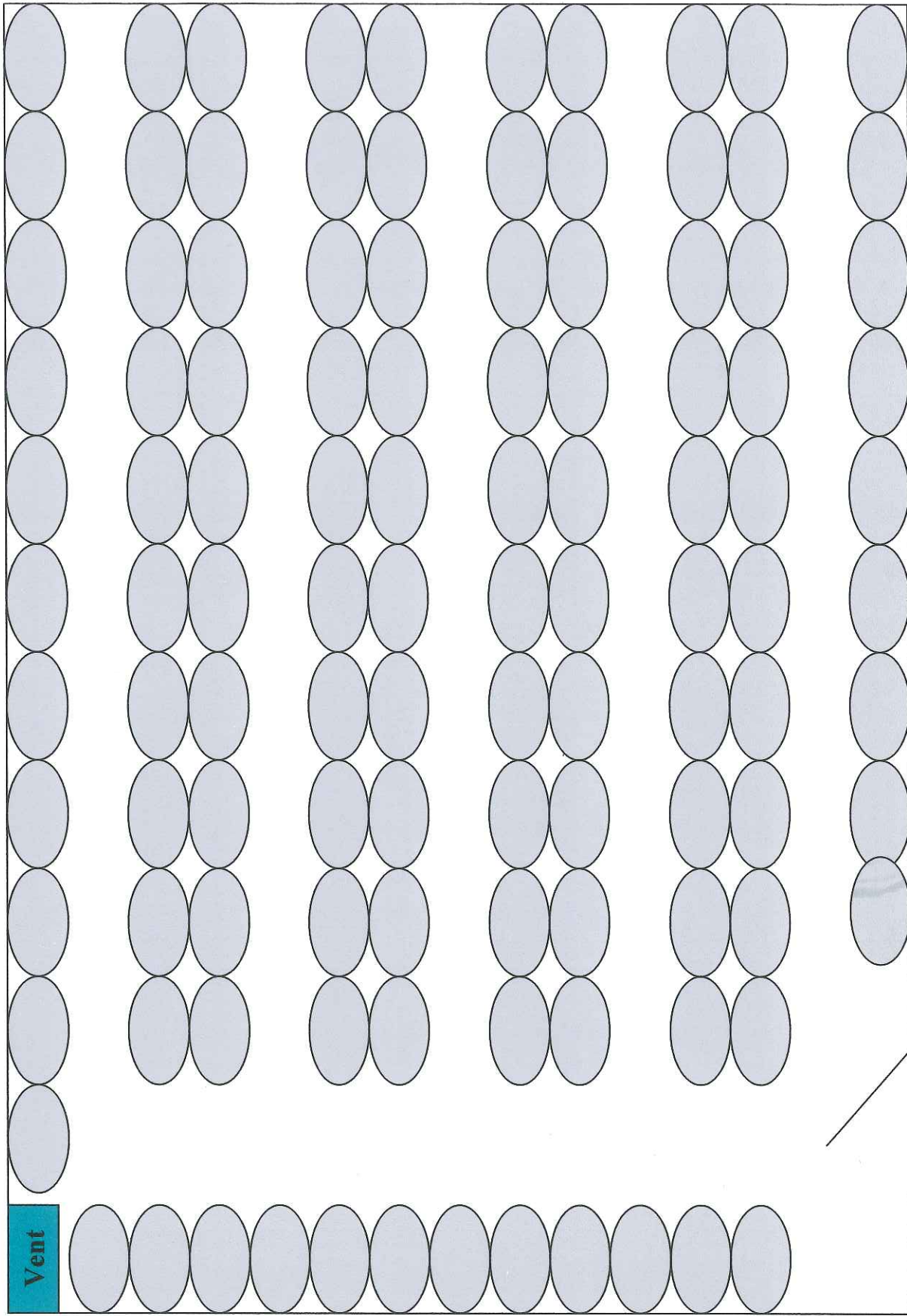
Date:

12/17/07

REFERENCE ITEM 6



Storage Configuration for the Drum Storage Room



Entrance

REFERENCE ITEM H



acme finishing co. inc.

1595 Oakton Street
Elk Grove Village, IL 60007
847-640-7890 Fax: 847-640-0298

REFERENCE ITEM H

PURCHASE ORDER

PO #	
8941	
DATE	PAGE
12/18/2007	1 of 1
SHIPPED VIA	
best	

Vendor: SETON
PO BOX 819
BRANFORD, CT 06405-0819

Ordered Date: 9/27/2007

Due Date: 10/4/2007

Phone: (800) 243-6624 Fax: (800) 345-7819

PRODUCT NO.	DESCRIPTION	QUANTITY	UNITS	PRICE / UNIT	EXTENDED PRICE
68075 V	Hazardous Waste Label	2	EACH	30.700	\$61.40
68077 V	Non-Hazardous Waste Label	1	EACH	30.700	\$30.70
68081 V	Universal Waste Label	1	EACH	30.700	\$30.70
68084 V	Used Oil Label	1	EACH	30.700	\$30.70
M2257	Illegal Parking Label	1	EACH	39.500	\$39.50
Freight Charge	Shipping Cost	1	EACH	15.210	\$15.21

Comments:**Acme Finishing minimum quality requirements for suppliers:**

1. The quantity per container must remain constant except for the last box, which may contain the remaining quantity.
2. All packaging must provide protection during shipping into Acme Finishing and the packaging must preserve the quality of the product while in handling and storage.
3. All boxes/containers are to protect and preserve the quality of the product at all times.
4. All boxes/containers are to be properly labeled and identified.
5. All shipments are to be accompanied with a packing slip, which includes the supplier name, product number, and Acme's purchase order number.
6. Upon visual inspection, the color and gloss of the paint and/or powder must meet manufacturer's specifications.
7. If information stated above is incorrect or the due date can not be met please contact Acme Finishing Purchasing Department immediately. MSDS and TDS sheets are required on all shipments of paint, powder, and chemicals.
8. All purchased products or materials received into Acme Finishing shall conform to all applicable legal and regulatory requirements.

Acme Finishing's Quality Policy

Acme Finishing Company Inc. is committed to meeting or exceeding our customers' expectations through continual improvement while providing a safe and positive environment for our employees.

Management Representative - Al Colella

BY: _____

acme finishing company inc.

FORM NO. AFPO 200-1 (REV. C)

PACKING LIST

PAGE# OF 1



SOLD TO:
ATTN: MR STEVE JAYHAN
ACME FINISHING
1595 E OAKTON
ELK GROVE VILLAGE IL 60007-214

SHIP TO:
ATTN: MR STEVE JAYHAN
ACME FINISHING
1595 E OAKTON
ELK GROVE VILLAGE IL 60007-214

DATE : 09/27/2007
SHP VIA : BEST WAY

Seton Identification Products
P.O. Box 819
20 Thompson Rd.
Branford, CT 06405-0819
PHONE: 1-800-243-6624
FAX: 1-800-345-7819

TERMS : PPA
ADD : PREPAID AND
SHP PT : 1100
DELIV# : 87244206

LINE#	CUSTOMER PART #	REORDER #	SKU	PRODUCT DESCRIPTION	SHIP QTY	UOM	B.O.QTY
				GJ917 NEW SETON BUYERS GUINEY SETON BUYERS GUI			
ORDER NO: 7210366 PO #: 8941							
0010		68081	Y249708	DRUM IDENTIFICATION LABELS (PSPL)	1	PAC	0
				Size: 6" x 6"			
				Legend: UNIVERSAL WASTE...			
				Color: WHITE/BLACK/PURPLE			
0020		68075	Y249702	DRUM IDENTIFICATION LABELS (PSPL)	2	PAC	0
				Size: 6" x 6"			
				Legend: HAZARDOUS WASTE...			
				Color: RED/WHITE			
0030		68037	Y249704	DRUM IDENTIFICATION LABELS (PSPL)	1	PAC	0
				Size: 6" x 6"			
				Legend: NON-HAZARDOUS WASTE...			
				Color: WHITE/GREEN			
0050		24695 / M2257		PARKING CONTROL LABELS REMOV ADH (P	1	PAC	
				Y232989			
				Size: 8" x 4-1/2"			
				Legend: YOU ARE PARKED ILLEGALLY PERSISTENT OFFENDERS WILL BE			
				Color: FLUORESCENT RED/BLACK LETTERS			
TOWED AWAY							
BALANCE TO FOLLOW							

10/2/07
bpo 11/10/07
bpo 11/10/07

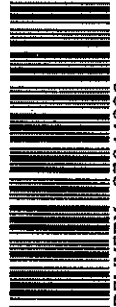
Any questions please call us toll free at 1-800-338-5810, e-mail us at custsvcs@seton.com, or fax us at 1-800-345-7819. For order status, invoice reprint or to place an order, contact us at www.seton.com.
Celebrating 50 Years of Excellence

SETON VIA: WAY GROUND

Seton Identification Products
P.O. Box 819
20 Thompson Rd.
Branford, CT 06405-0819
PHONE: 1-800-243-6624
FAX: 1-800-345-7819

CTN# 1 OF 1

SHIP TO



DELIVERY: 87244206
PPA PREPAID AND ADD
PO: 8941
ATTN: MR STEVE JAYHAN

ACME FINISHING
1595 E OAKTON
ELK GROVE VILLAGE IL 60007-2149

PACKING LIST

PAGE# 1

SETON

SOLD TO:

SHIP TO:

ATTN: MR STEVE JAYHAN
ACME FINISHING
1595 E OAKTON
ELK GROVE VILLAGE IL 60007-2149

ATTN: MR STEVE JAYHAN
ACME FINISHING
1595 E OAKTON
ELK GROVE VILLAGE IL 60007-2149

Seton Identification Products
P.O. Box 819
20 Thompson Rd.
Branford, CT 06405-0819
PHONE: 1-800-243-6624
FAX: 1-800-345-7819

DATE : 10/01/2007
SHP VIA : BEST WAY
TERMS : PPA
ADD : PREPAID AND
SHP PT : 1100
DELIV# : 87254040

LINE#	CUSTOMER PART #	REORDER #	SKU	PRODUCT DESCRIPTION	SHIP QTY	UOM	B.O.QTY
-------	-----------------	-----------	-----	---------------------	----------	-----	---------

GJ917 - NEW SETON BUYERS GUINEW SETON BUYERS GUI

ORDER NO: 7210366 PO #: 8941

0040 68084 Y249711

DRUM IDENTIFICATION LABELS (PSPL)

Size: 6" x 6"
Legend: USED OIL
Color: WHITE/BLACK

1 PAC

0

Red 10/1/07

SETON VIA: BEST WAY GROUND

Seton Identification Products
P.O. Box 819
20 Thompson Rd.
Branford, CT 06405-0819
PHONE: 1-800-243-6624
FAX: 1-800-345-7819

CTN# 1 OF 1

SHIP TO

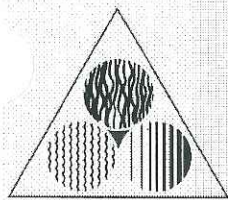


DELIVERY: 87254040
PPA PREPAID AND ADD
PO: 8941
ATTN: MR STEVE JAYHAN

ACME FINISHING
1595 E OAKTON
ELK GROVE VILLAGE IL 60007-2149

Any questions please call us toll free at 1-800-338-5810, e-mail us at custsvc_seton@seton.com, or fax us at 1-800-345-7819. For order status, invoice reprint or to place an order, contact us at www.seton.com.

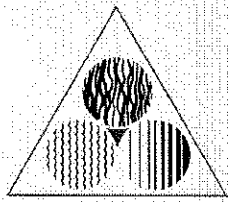
Celebrating 50 Years of Excellence



Copy: GENERAL REFERENCE

Hazardous Waste Management

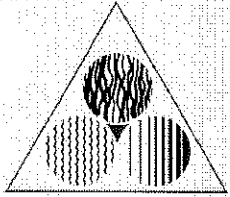
United States Compliance Corporation



Introduction to Hazardous Waste Management

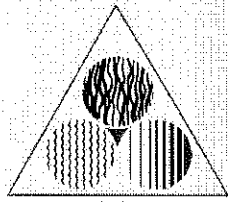
- Training required by federal, state and local agencies
- Required for **all** employees handling hazardous waste or related documentation
- Training required to be completed annually for LQGs
- Training documentation must be kept for current employees for as long as company is in operation





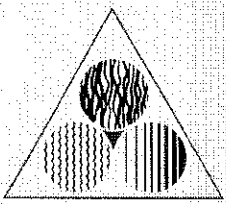
Training Includes:

- Hazardous Waste Definition
- Waste Codes
- Waste Streams
- Waste Evaluation
- Universal Waste
- Used Oil
- Generator Categories
- Containers
- Labeling
- Satellite Accumulation
- Storage
- Shipping Preparation/Paperwork
- Manifests
- Emergency Procedures
- Job Descriptions
- Waste Minimization
- Q & A



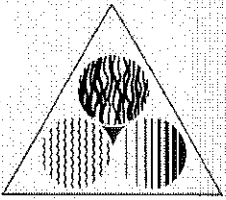
What is Hazardous Waste?

- Hazardous Waste: A solid, liquid, or aqueous waste which displays a “*hazardous characteristic*” or is specifically “*listed*” as hazardous waste.
 - Waste is any “*discarded material*” that is not excluded from the definition of hazardous waste.
 - Discarded Material is material that is “*abandoned*,” “*recycled*” or inherently “*waste-like*.” EPA views old chemicals that have not been used in years and which are unlikely to be used in the foreseeable future as waste.



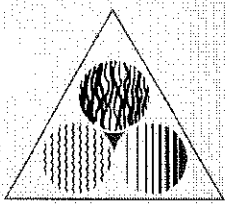
Waste Evaluation

- Anyone who produces or manages a waste must evaluate the waste to determine if it is hazardous
 - Is it exempt
 - Is it a “listed” waste
 - Does it display a “characteristic”
- How to Evaluate
 - Generator knowledge of product composition and characteristics and of the process
 - MSDS to determine constituents in waste (any listed wastes, pH, flashpoint)
 - TCLP- Toxicity Characteristic Leaching Procedure
 - Laboratory analysis that provides analytical results as to constituents of waste
 - Determine if above maximum concentration for the toxicity characteristics



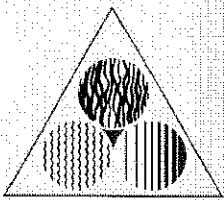
What Makes a Waste Hazardous?

- **Classes of Hazardous Waste**
 - **Listed Wastes**- wastes that are specifically listed because known to be hazardous
 - **F-Listed wastes**- from non specific sources
 - EX: solvents such as trichloroethylene (F001), acetone and xylene solvents (**F003**), toluene and MEK (F005)
 - **K-Listed wastes**- from specific sources
 - **P-Listed Waste**- acutely toxic
 - **U-Listed** — discarded chemicals



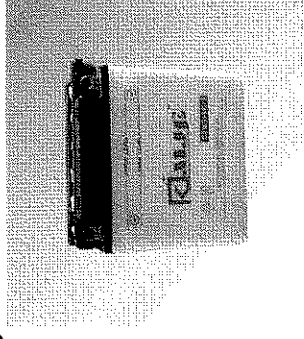
What Makes a Waste Hazardous cont.

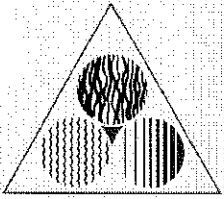
- **Classes of Hazardous Waste Cont.**
 - **Characteristic Wastes**- wastes that display certain properties or characteristics to make them hazardous
 - **D001 - Ignitable- flashpoint less than 140 degrees F**
 - Ex: *Waste Aerosols, Isopropyl Alcohol, Acetone, and Xylene Solvents*
 - **D001 - Oxidizing**
 - Ex: oxides, peroxides
 - **D002 - Corrosive- pH less than or equal to 2.0 OR pH greater than or equal to 12.5**
 - Ex: acids and bases (HCL, sodium hydroxide)
 - **D003 - Reactive- unstable and reacts violently with water**
 - Ex: hydrogen cyanide, permanganates
 - **D004-D043 - Toxic**
 - Ex: heavy metals, lead, silver, arsenic, chromium



Universal Waste

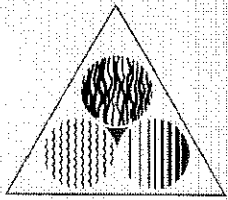
- What is Universal Waste?
 - Widespread, commonly disposed of, easily managed, low-level hazardous wastes:-
 - Batteries
 - Fluorescent bulbs
 - Pesticides
 - Mercury Containing Thermostats
 - Other depending on state
- Subject to “relaxed” set of procedures to reduce regulatory burden on companies **if recycled** (if not recycled, must be managed as hazardous waste)
 - Streamlined requirements for notification, labeling, accumulation time limits, employee training, response to releases, off-site shipments, tracking, and transportation.
 - Allowed to accumulate universal waste **for recycling** without counting toward hazardous waste generator status
- States may have own or more stringent regulations and definitions of Universal Waste





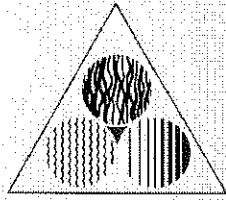
Accumulation, Labeling and Storage

- **Accumulation**
 - Accumulate no longer than one year from date waste is generated unless accumulating longer for proper recovery, treatment or disposal
- **Labeling**
 - Label with the date it became a waste
 - “Universal Waste” - and
 - “Fluorescent Bulbs”
 - “Batteries”
 - “Pesticides”
 - “Mercury Thermostat”
- **Storage:** Must store in such a way as to prevent release of any components or materials
 - Containers or packages that remain closed, are structurally sound, lack evidence of spillage, and are compatible with the contents



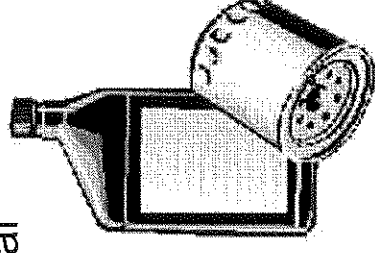
Shipping and Record Keeping

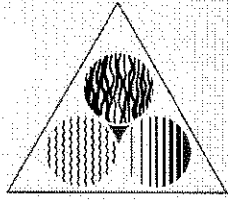
- May ship waste to other universal waste handlers or destination facilities
 - Hazardous waste hauler not required
- Manifest is not required
- Invoices, bills of lading, receipts must be kept for three years



Used Oil Management: Used Oil Defined

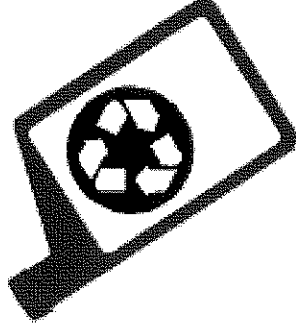
- EPA definition: "any oil that has been refined from crude oil or any synthetic oil that has been used and as a result of such use is contaminated by physical or chemical impurities."
 - Possible contaminants: metal particles from engine wear, chemical contaminants such as gasoline, toluene
- Used oil includes:
 - synthetic oils, transmission and brake fluids, lubricating greases
 - Oils used as hydraulic fluid, used to lubricate automobiles and other machinery, cool engines, or suspend materials in industrial processes
- Used oil does not include:
 - products derived from vegetable or animal fats.

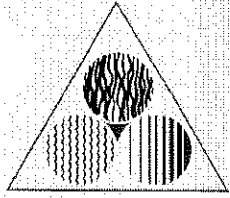




Used Oil Management - Used Oil Rule and Recycling

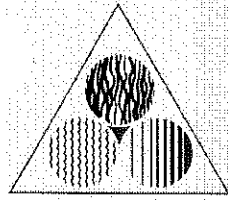
- The Used Oil Rule presumes all used oil will be recycled
 - Used oil that is disposed of and not recycled must be characterized
 - If found to be hazardous, must be managed as such
 - Used oil destined for recycling is presumed **not** to be hazardous
 - Must be managed onsite according to the Used Oil Rule management standards



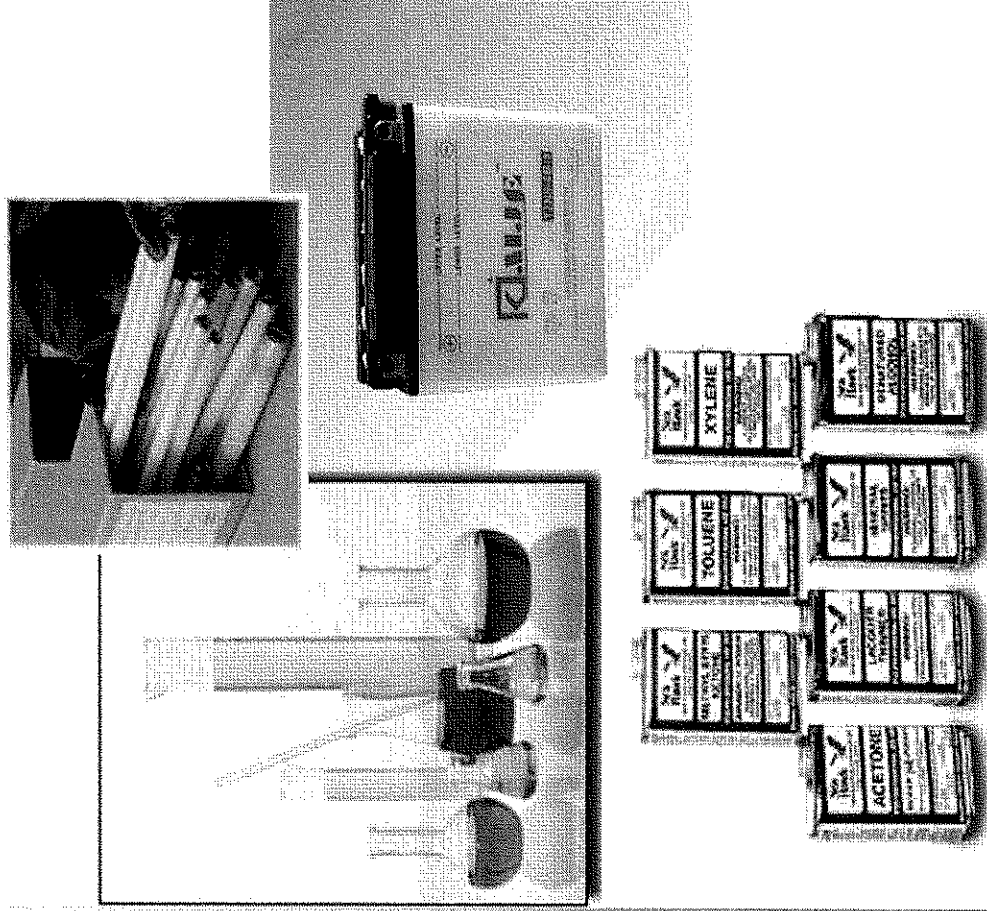


Used Oil Management Standards

- Management standards apply to all generators regardless of amount of oil they handle
- Labeling and Storage:
 - Containers of used oil must be labeled or marked clearly with the words **"Used Oil"**.
 - Containers must be closed
- Off-Site Shipments:
 - Generator must ensure that their used oil is transported by a transporter who has obtained an EPA ID number
- Record keeping:
 - Must keep records of shipments onsite for at least three years
 - Manifests, bills of lading, receipts
- Mixing:
 - Used oil mixed with hazardous waste must be managed as hazardous waste

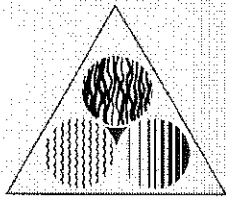


Determine Waste Streams



EXAMPLES

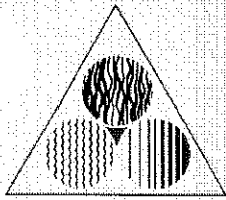
- Solvents
- Acids/Bases
- Filters
- Rags
- Fluorescent Lights
- Batteries
- PCBs
- Used Oil/Sorbents



What's Your Generator Status?

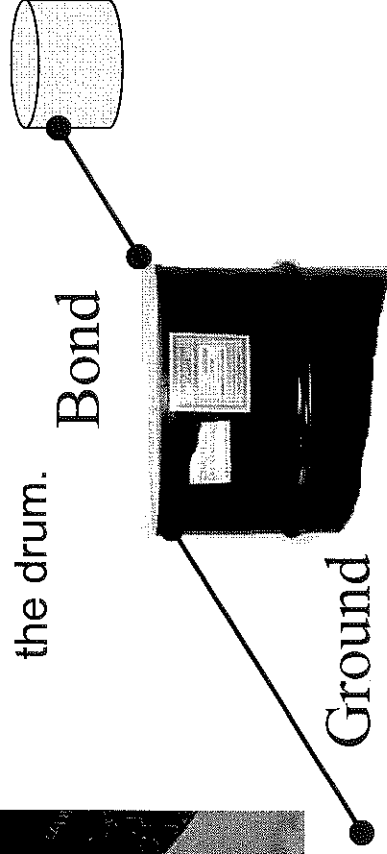
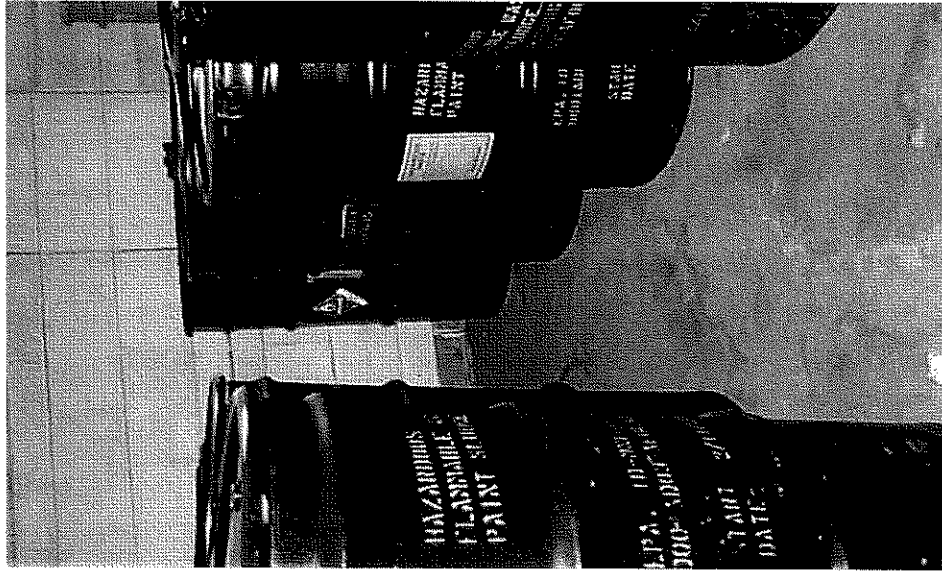
Generator Size	Accumulation Limit	Storage Time Limit
Conditionally Exempt Small Quantity Generator (CESQG) Generates 220 pounds or less of waste per month (Less than 1/2 drum)	2,200 Pounds (About four 55 gallon drums) Generators exceeding this limit in ANY month must manage waste according to SQG guidelines	No limit
Small Quantity Generator (SQG) Generates between 220 pounds and 2,200 pounds of waste per month (About 1/2 to 4 drums)	13,200 Pounds (About twenty four 55 gallon drums) Generators exceeding this limit in ANY month must manage waste according to LGQ guidelines	180 days (After accumulation start date) Must ship waste off site within 180 days after the accumulation start date
Large Quantity Generator (LQG) Generates 2,200 pounds or more of waste per month (More than 4 drums)	No limit on the amount of waste that can be stored on site	90 days (After accumulation start date) Must ship waste off site within 90 days of the accumulation start date

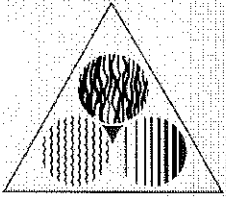
220pounds= 100 kilograms and approximately 22 gallons of liquid



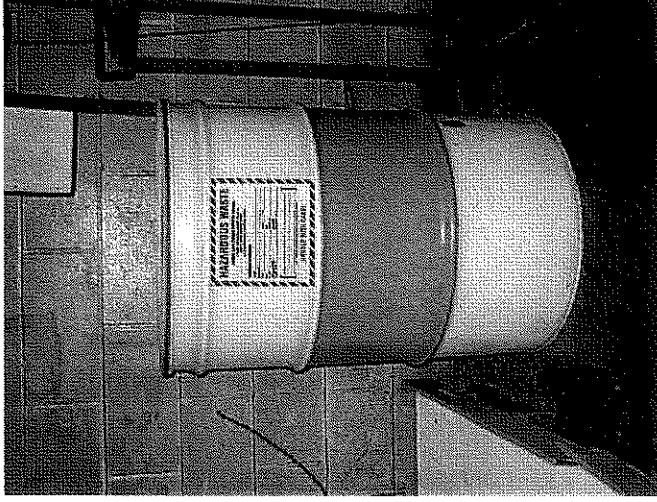
Containers

- Container compatible with waste
- Good condition
- Containers **MUST** be closed when material is not being added or removed
 - Closure device should allow waste to be added or removed easily
- Whenever possible use the container you intend to ship in
- Containers must be grounded when adding or removing flammables.
Transfer container must be bonded to the drum.





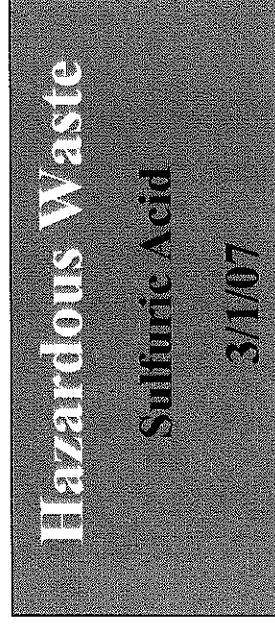
Hazardous Waste Labeling

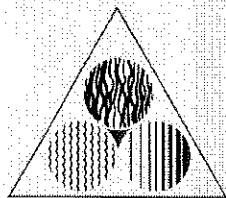


Place label on drum. To the side of the bung.

Container **must** be marked with the following while on-site:

- The words "Hazardous Waste"
- A clear description of the waste
- The accumulation start date
(equals the moment waste is first placed into the container)





Transportation Labeling

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME _____
ADDRESS _____
CITY _____ STATE _____ ZIP _____
EPA ID NO. _____ WASTE NO. _____
ACCUMULATION START DATE _____ MANIFEST DOCUMENT NO. _____

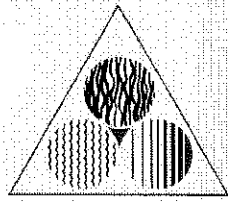
DO NOT PROPER SHIPPING NAME AND OR NA NO. WITH PREFIX

HANDLE WITH CARE!

This label may be used during accumulation. If it is not, it must be completed and applied before shipment.

The waste may require additional DOT labeling (flammable, corrosive, reactive, etc.). If so, it must have the corresponding label attached.





Satellite Accumulation

For slowly accumulating waste streams:

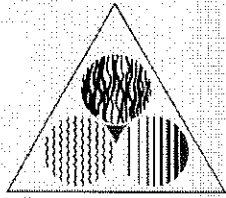
- Designate a satellite accumulation container – the container should be labeled as “SATELLITE ACCUMULATION” (is recommended but not required)
- Container must be no larger than 55 gallons for hazardous waste
- Either under direct control of operator with visual daily inspections or must have documented weekly inspections
- Accumulation start date must be entered once full
- Time starts ticking after the container is filled
- 3 days from fill date to get the drum into storage

**SATELLITE
ACCUMULATION**

**HAZARDOUS
WASTE**

Sulfuric Acid

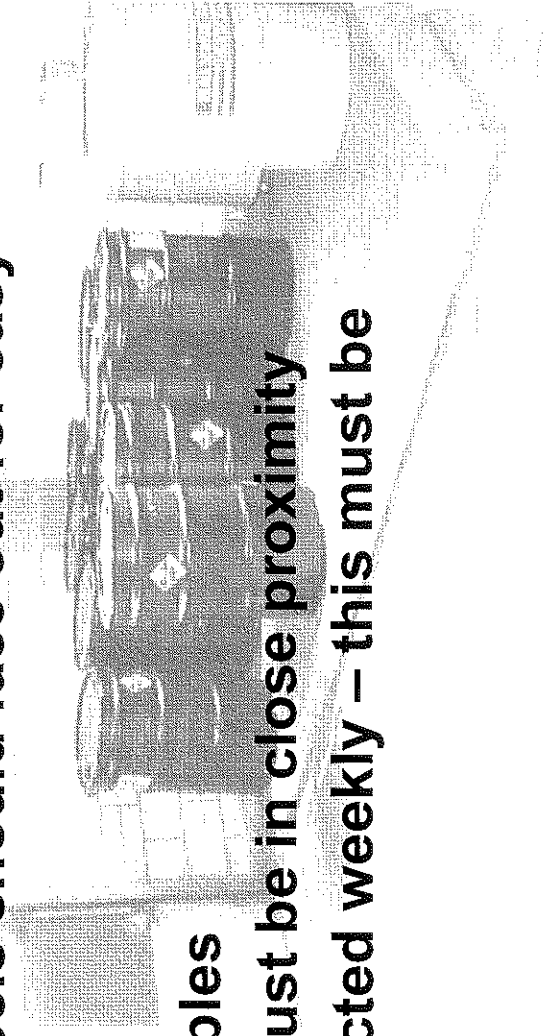
Accumulation Start Date:
9/1/2007

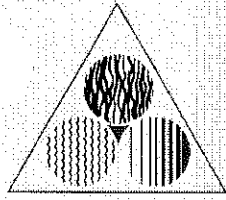


Storage of Hazardous Waste

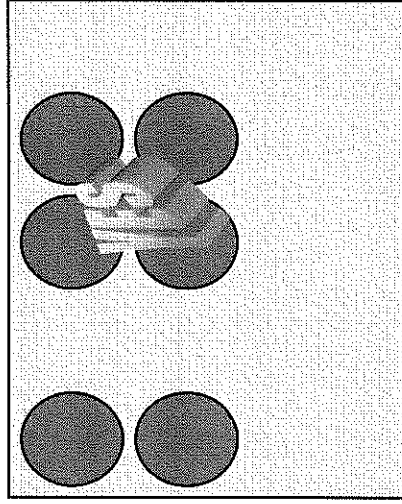
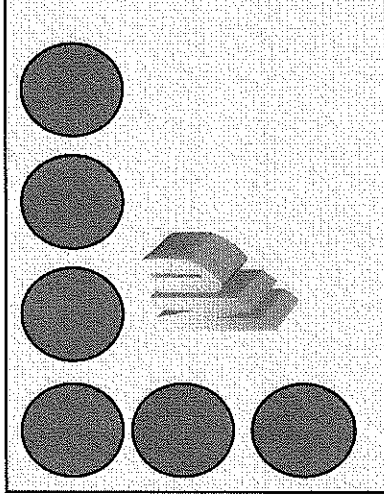
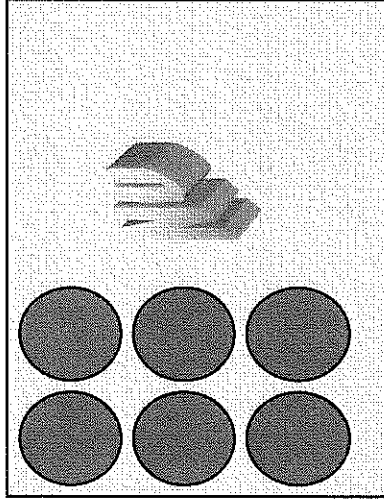
Basic Storage Requirements

- Area should be placarded
- Impermeable floor – no cracks, drains or sumps
- Hazardous Waste containers **MUST** be closed at all times except when adding or removing waste
- Labeled drums – labels should face out for easy reading
- Aisle space
- Separate incompatibles
- Spill kit materials must be in close proximity
- Area must be inspected weekly – this must be documented

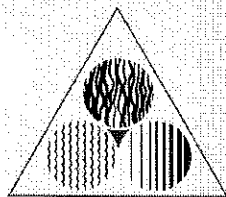




Aisle Space Requirements



- Adequate Aisle Space
- Do Not Double Stack Flammables
- Labels Faced Outward



Inspections



United States Compliance Corporation

Hazardous Waste Storage Area Weekly Inspection Log

Generator Name: _____

EPA ID #: _____

Area Description: _____

Inspector Full Name	# of Containers	Inspection Date	Problems noted during inspection (must be filled out even if "none")	Corrective Action/Comments
John Doe	15	9/30/05	One open waste oil drum	Properly closed waste oil drum. Shipped 2 drums

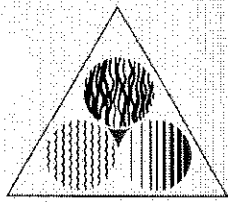
This following should be checked during the weekly inspection of hazardous waste storage containers/areas:

- Containers are closed
- Containers are properly labelled
- Flammable materials are properly grounded/bonded during transfer
- Aisle space is adequate
- There is no leakage or container deterioration
- Containers have fill dates
- Storage duration meets timeliness of generator status

Please contact your USOC representative if you have questions on the proper storage or labelling of hazardous waste containers.

- Documented Hazardous Waste inspections must be conducted weekly by an employee with training

- Containers are closed
- Containers are properly labelled
- Flammable materials are properly grounded/bonded during transfer
- Aisle space is adequate
- There is no leakage or container deterioration
- Containers have fill dates
- Storage duration meets timeliness of generator status

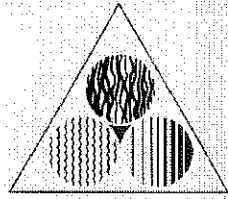


Shipment Preparation and Paperwork

- Containers Labeled with DOT Label
- Manifests and LDRs (Land Disposal Restrictions) Completed, Reviewed & Signed (Federally required for LQG and SQG)
 - Must be kept for 3 years.
- Bills of Lading for Recycled Materials, Universal Waste and other Non-Hazardous Wastes
 - Must be kept for 3 years
- Certificates of Destruction
 - Must be kept for 3 years



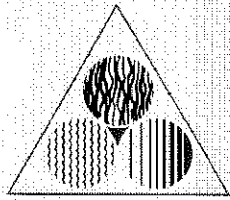
- **Multi-copy “Cradle to Grave” Tracking Document**
- **Required for all generators (LQGs and SQGs) who offer up hazardous waste for transport**
- **Must be signed by someone in the company who has had training**
- **Transporter will also sign and take the needed paperwork. You will be given a copy for records. Destination facility will send final signed copy back to generator.**
- **Manifests must be distributed to agencies within allotted timeframe – state specific in many cases**



Emergency Procedures

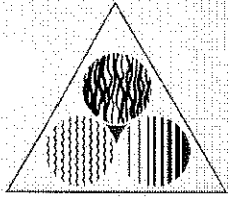
What to do in the event of a Waste Emergency Incident/Spill

- Do not attempt to handle yourself
- Evacuate immediate area
- Call 9-1-1 if needed
- Page ERT Members
 - Follow Protocol & Training
 - Follow Contingency Plan
 - Follow Shutdown Procedures
- **DO NOT CLEAN UP YOURSELF!!!**



Job Titles/Responsibilities

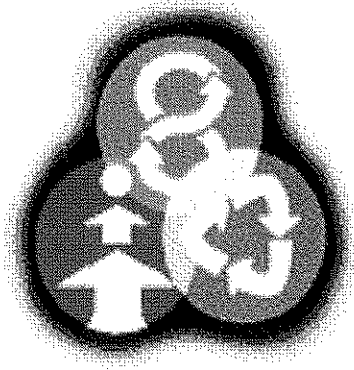
- **Hazardous Waste Director/Emergency Response Coordinator**
 - This position has overall responsibility for all hazardous waste activities.
 - Trained in the proper management and handling of hazardous materials and waste streams.
 - Coordinates the resources and procedures of the company to most effectively support the response team.
- **Hazardous Waste Handlers/Emergency Response Team Members**
 - Anyone who works with hazardous materials and hazardous waste in any way.
 - Trained in the proper management and handling of hazardous materials and waste streams.
 - Responsible for the maintenance of company safety standards, policies, procedures, and the execution of those safety standards.

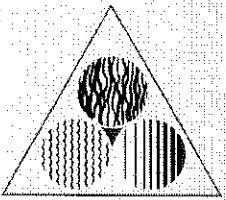


What is Waste Reduction and Minimization?

Waste Reduction and Minimization is Required by Federal Regulations for LQGs

- Good Operating Practices
- Material and Product Substitution
- Process of Technology Modification
- Waste Concentration
- Recovery, Recycling, Reuse





What keeps companies from disposing waste illegally?

- Conscience
- Concern for people and the environment
- Responsible from cradle to grave (manifest tracking system)
- Agency enforcement/inspections
 - Random inspections
 - Heavy fines
- EPA ID
 - Generators and transporters must be licensed
- Chemical Tracking
 - SARA
 - Waste records





Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD0050878121	Manifest Document No.	2. Page 1 of	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address ACME FINISHING CO INC. 1595 OAKTON, ELK GROVE VILLAGE, IL. 60067				A. Illinois Manifest Document Number IL 1126190		
4. Generator's Phone (312) 640-7890				B. Illinois Generator's ID 0314400002		
5. Transporter 1 Company Name DOMBROWSKI & HOLMES, INC.		6. US EPA ID Number ILD056622457		C. Illinois Transporter's ID 09057		
7. Transporter 2 Company Name		8. US EPA ID Number		D. (312) 778-1400 Transporter's Phone		
9. Designated Facility Name and Site Address EWR, INC. PO BOX 160 COAL CITY, IL. 60416		10. US EPA ID Number ILD087157251		E. Illinois Transporter's ID 09057		
				F. () Transporter's Phone		
				G. Illinois Facility's ID 0630200003		
				H. Facility's Phone (815) 634-2211		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	L Waste No.
a. HM		No. Type				EPA HW Number 10101
b. X EXCESS PAINT N.O.S. NA 1263		001 TT 01375		1		Authorization Number 9140830
c.						EPA HW Number
d.						Authorization Number
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.						
Printed/Typed Name DENNIS WALTERS		Signature Dennis Walters		Date 10/9/84		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name HANK URBANSKI		Signature Hank Urbanski		Date 10/9/84
18. Transporter 2 Acknowledgement or Receipt of Materials		Printed/Typed Name		Signature		Date
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name R Hanson		Signature R Hanson		Date 10/9/84		



Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2000-0404. Expires 7-31-81

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but is required by Illinois law.					
3. Generator's Name and Mailing Address ACME FINISHING CO. INC. 1595 OAKTON. ELK GROVE VILLAGE, IL 60007						A. Illinois Manifest Document Number IL 1126189							
4. Generator's Phone (312) 640-7890						B. Illinois Generator's ID 10131141401010012							
5. Transporter 1 Company Name DOMBROWSKI & HOLMES INC						C. Illinois Transporter's ID 001517							
6. US EPA ID Number ILDO 56622657						D. 312-778-1400 Transporter's Phone							
7. Transporter 2 Company Name						E. Illinois Transporter's ID							
8. US EPA ID Number						F. () Transporter's Phone							
9. Designated Facility Name and Site Address EWR INC P.O. BOX 160 COAL CITY, IL. 60416						G. Illinois Facility's ID 06130120100013							
10. US EPA ID Number ILDO 87157251						H. Facility's Phone 815) 634-2211							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		L Waste No.	
a. X EXCESS PAINT N.O.S. NA 1263						001 TT		02.145		1		EPA HW Number 100211 Authorization Number 940830	
b.												EPA HW Number Authorization Number	
c.												EPA HW Number Authorization Number	
d.												EPA HW Number Authorization Number	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, according to the requirements of the Department of Transportation.													
Printed/Typed Name DENNIS WALTERS						Signature Dennis W Walters						Date 10/4/84	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature Donald Emery						Date 10/4/84	
Printed/Typed Name DONALD EMERY						Signature						Date	
18. Transporter 2 Acknowledgement or Receipt of Materials						Signature						Date	
Printed/Typed Name						Signature						Date	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name R HANSON						Signature R Hanson						Date 10/4/84	

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-27

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5

GENERATOR COPY - PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111 1/2 Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.



finishing co., inc.

*new sized
for 2 year
one*

1595 oakton, elk grove village, illinois 60007, 312-640-7890

August 1, 1983

IL0005087812 G, T S O, PA

U.S. Environmental Protection Agency
Mail Code: 5HW-13
230 S. Dearborn
Chicago, Ill. 60604

Attn: Ms. Zetta Davis

Dear Ms. Davis:

Thank you for your informative instructions given to me in our phone conversation on July 28, 1983. As I stated at that time, our company applied for a permit as a hazardous waste storage site under RCRA because we mistakenly believed that waste haulers would maintain their policy of removing only large quantities of hazardous waste. Because we are as small generator, the time to accumulate these quantities of waste would be considerable. Now, under RCRA, they are willing to transport our hazardous wastes as frequently as is necessary to keep our accumulation time to under 90 days.

Consequently, we are requesting that you change our status to simply a hazardous waste generator because we are not a hazardous waste treatment, storage, or disposal site. Our hazardous waste materials are removed from our site in less than 90 days from the time of generation.

Your cooperation in implementing this change in our classification will be greatly appreciated.

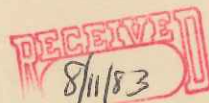
Yours very truly,

ACME FINISHING CO., INC.

Dennis Walters

Dennis Walters

Copy: Mr. Andrew Vollmer, Ill. E.P.A.



WASTE MANAGEMENT
BRANCH

*20
8/9/83*

NOV 30 1981

Dennis Walters, Vice President
Acme Finishing Co.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: Acme Finishing Co.
Consent Agreement & Final Order
V-M-81-R-83

Dear Mr. Walters:

This is to acknowledge receipt of the Consent Agreement and Final Order signed by you. A fully executed copy of the Consent Agreement and Final Order is enclosed for your files.

Your cooperation in resolving this matter is appreciated.

Very truly yours,

LS/

Jane E. Schulteis
Chief, Litigation Unit II

Enclosure

cc: William Childs
Land/Noise Pollution Control Division
Illinois EPA

Paul Biebel
Illinois Attorney General

Donaldson/Biras
Stone

✓ Regional Hearing Clerk

AUG 7 1981

Dennis Walters, Vice President
Acme Finishing Co.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: Acme Finishing Co.
Consent Agreement & Final Order
V-W-81-R-83

Dear Mr. Walters:

This is to acknowledge receipt of the Consent Agreement and Final Order signed by you. A fully executed copy of the Consent Agreement and Final Order is enclosed for your files.

Your cooperation in resolving this matter is appreciated.

Very truly yours,

LS/
Jane E. Schulteis
Chief, Litigation Unit II

Enclosure

cc: William Childs
Land/Noise Pollution Control Division
Illinois EPA

Paul Biebel
Illinois Attorney General

Donaldson/Biros
Stone
Regional Hearing Clerk

8/4/81

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

ACME FINISHING CO., INC.
ELK GROVE VILLAGE, ILLINOIS

} DOCKET NO. V-W-81-R-83

} CONSENT AGREEMENT

} AND

} FINAL ORDER

EPA ID NO. IL D 005087812

WHEREAS:

1. This is a Consent Agreement and Final Order issued in an administrative enforcement proceeding under Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. § 6901, et seq.
2. This proceeding was initiated by a Complaint and Notice of Opportunity for Hearing (Complaint) issued on May 19, 1981, alleging that the Acme Finishing Co., Inc., (Respondent) had violated the RCRA Interim Status Standards for hazardous waste management facilities, 40 U.S.C. § 6925, at its facility at 1595 Oakton, Elk Grove Village, Illinois.
3. For the purpose of this proceeding only and without prejudice to any other proceedings, the Respondent hereby:
 - a. admits the jurisdictional allegations contained in the Complaint;
 - b. admits allegations as set forth in the Complaint; and
 - c. explicitly waives its right to request a hearing on the Complaint.
4. In response to the May 19, 1981, Complaint, Respondent's representative, Dennis Walters, in his June 2 and 18, 1981, letters to the United States Environmental Protection Agency, Region V, represented that the following corrective actions were taken:
 - a. a detailed waste analysis plan has been prepared for the facility;
 - b. "Danger - Unauthorized Personnel Keep Out" signs have been posted at the entrance to the hazardous waste storage area;
 - c. a written schedule for the inspection of the waste storage area and its contents has been prepared;
 - d. an inspection log to maintain records of inspection has been prepared;
 - e. personnel training records on current personnel has been prepared;
 - f. "No Smoking" signs have been posted at the entrance to the hazardous waste storage area and also in close proximity to drums containing ignitable waste;

- g. a written contingency plan for the facility has been prepared;
 - h. copies of the contingency plan were submitted to all local police departments, fire departments, hospitals and State and local emergency response teams that may be called upon to provide emergency service;
 - i. a copy of the contingency plan has been placed on file at the facility; and
 - j. names of an emergency coordinator and an alternate have been designated for the facility and the coordinator is given full authority to commit the resources needed to carry out the contingency plan.
5. Respondent consents to the issuance of the Final Order hereinafter recited.

FINAL ORDER

Respondent, Acme Finishing Company, Incorporated, shall effective immediately comply with the following requirements for its facility located at 1595 Oakton Street, Elk Grove Village, Illinois:


- 1. Respondent shall maintain and keep up-to-date its written waste analysis plan. Any deficiencies noted in the said plan by the U.S. EPA shall be corrected and such corrections verified in writing within fifteen (15) days of notice by U.S. EPA to Respondent.
- 2. Respondent shall maintain "Danger -Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility and at other locations which can be seen from any approach to this active portion.
- 3. Respondent shall follow its written inspection schedule and record summary of inspections of all hazardous waste facilities in its inspection log.
- 4. Respondent shall maintain and keep up-to-date its training records on personnel until the earlier of closure of the facility or three years from the date the employee last worked at the facility.
- 5. Respondent shall maintain "No Smoking" signs at the entrance to the hazardous waste storage area and in close proximity to drums containing ignitable waste.

6. Respondent shall maintain a copy of its contingency plan at the facility. The contingency plan shall be kept up-to-date. Any deficiencies noted in said plan by U.S. EPA shall be corrected, and such corrections verified in writing to U.S. EPA within fifteen (15) days of notice by U.S. EPA to Respondent.


7. Respondent shall have, at all times, at least one employee either on the facility premises or on call as an emergency coordinator that is available to coordinate all emergency response measures and has the authority to commit the resources needed to carry out the contingency plan.

8. Respondent shall comply with all applicable RCRA requirements in managing hazardous wastes.

The above Order is hereby consented to by both of the parties to this proceeding.

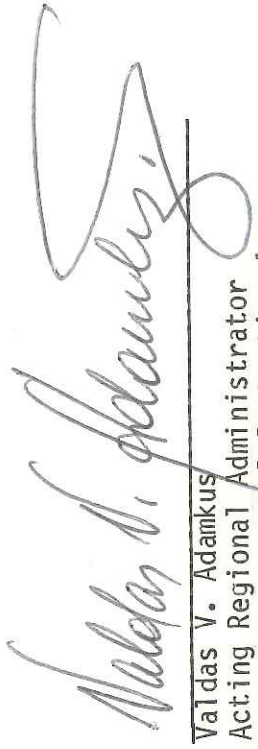

Dennis Walters
Vice President
Acme Finishing Company, Inc.

Dated: 7-24-81 At: ELK GROVE VLG., IL.


Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental Protection Agency
Region V

Dated: 4 Aug 81 At: Chicago, Illinois

Therefore, it is so ordered. This Order shall become effective immediately.


Valdas V. Adamkus
Acting Regional Administrator
U.S. Environmental Protection Agency
Region V

Signed this 4th day of August, 1981



finishing co., inc.

1595 oakton, elk grove village, illinois 60007, 312-640-7890

July 24, 1981

Ms. Sandra S. Gardebring
Director, Enforcement Division
Region V, U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, Il. 60604

Re: Consent Agreement and Final Order
Acme Finishing Co., Inc.
EPA ID No. ILD 005087812
Docket No. V-W-81-R-83

Dear Ms. Gardebring:

In response to your letter of July 17, 1981, we are sending
copies of our waste analysis and contingency plans for review by your
office. Also enclosed are signed copies of the Consent Agreement and
Final Order.

Should you find any deficiencies in our plans, we will promptly
modify them to your recommendations.

Very truly yours,

ACME FINISHING CO., INC.

Dennis Walters

DW/gm

WASTE ANALYSIS PLAN

for

ACME FINISHING CO., INC.

To comply with Section 265.13 of the Interim Status Standards of the federal hazardous waste management regulations, all chemical waste generated and stored at Acme Finishing Co. must be analyzed to determine its physical and chemical makeup. Once this information has been determined, it can be used to comply with the requirements of the regulation pertaining to the proper treatment, storage, and disposal of our waste material.

All chemical waste materials, except those which are known to be non-hazardous, will be handled as follows:

A representative sample of the waste material is to be collected. Since each type of waste material will vary from drum to drum, samples of approximately $\frac{1}{4}$ pound should be taken from each of several drums (a minimum of four) and combined to form the representative sample. The sampling from each drum will be done as follows:

1. For solid wastes (the spray booth sludge), cut or chisel pieces of sludge from the top surface of each drum.
2. For more liquid wastes (degreaser sludge, cold strip tank sludge, hot strip tank sludge, wastewater treatment sludge, and waste paint solvent), insert a four foot long metal tube of approximately $\frac{1}{2}$ inch inside diameter into the drum of waste to the full depth of the drum. Cover the upper opening of the tube and withdraw it from the drum. Quickly, put the lower end of the tube over the sample container and uncover the upper opening of the tube. The contents of the tube should drain into the container. If the tube becomes packed with more solid material, use air pressure to force the contents into the sample container.

The representative sample of each waste will then be sent to a commercial testing laboratory for analysis. Based on our knowledge of these wastes, and the results of previous analysis required for state disposal permits, the analysis should establish the following characteristics for the wastes indicated:

- The characteristics of ignitability set forth in Section 261.21

- Degreaser sludge
 - Waste Paint sludge
 - Spray booth sludge

- The characteristics of corrosivity set forth in Section 261.22

- Hot strip tank sludge
 - Cold strip tank sludge

- The characteristics of EP Toxicity set forth in Section 261.24

- Degreaser sludge
 - Waste paint solvent
 - Spray booth sludge
 - Hot strip tank sludge
 - Cold strip tank sludge
 - Wastewater treatment sludge

If the characteristics established in the analysis indicate the material should be classified as a hazardous waste, based on the criteria set forth in Section 261-Subpart B of the code, then the material should be handled accordingly and is subject to all the current requirements of the code (Part 265-Interim Status Standards for owners and operators of Hazardous Waste Treatment, Storage, and Disposal Facilities.)

The chemical composition of our waste materials within each classification type will not vary significantly because our raw materials do not vary significantly. However, if the types of raw materials used in the metal cleaning or painting processes change considerably, a new analysis of the waste materials affected by the

change, should be performed.

Waste analysis records will be used to obtain permits from waste regulationg agencies and will be kept on file at the facility.

JUL 1 7 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5EWHME

Dennis Walters, Vice President
Acme Finishing Company, Incorporated
1595 Oakton Street
Elk Grove Village, Illinois 60007

RE: Acme Finishing Company, Inc.
EPA ID No. ILD 005087812
Docket No. V-W-81-R-83
Consent Agreement and Final Order

Dear Mr. Walters:

Thank you for your June 2 and 18, 1981, letters submitted in response to the above-referenced Compliance Order issued on May 19, 1981.

To the extent that the above information accurately represents the facts, we find that the Acme Finishing Company, Incorporated, has taken appropriate action to comply with the requirements of the subject Order. However, we want to review your written waste analysis and contingency plans for completeness. Within ten (10) days of receipt of this letter, please send a copy of the two plans to Enforcement Division, Region V, United States Environmental Protection Agency, Attention: Compliance Section, at 230 South Dearborn Street, Chicago, Illinois 60604.

A Consent Agreement and Final Order, closing out the matter, is enclosed for your review and signature. Please have it signed by an official authorized to legally bind your company to the terms of the agreement, and forward the signed document to this office within ten (10) days from receipt of this letter.

Upon receipt of the executed Consent Agreement and Final Order, a fully executed copy will be returned to you for your file. If you should have any questions regarding the above matter, please do not hesitate to contact Mr. Thomas Daggett, an attorney of my staff at (312) 886-6729. Your attention to this matter is appreciated.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

bcc: Schulteis
Daggett. *TD 7/7/81*

IB/fw 07-06-81:3-2110
OK 7/7/81
BRYSON

DiDOMENICO
EDD 7/8/81
GARDEBRING
Original Signed by Sandra S. Gardebring

REAPE
GMR 7/8/81

MINER
WAW 7/8/81

MYERS
fm 7/8

MANZARDO

FENNER
KR



finishing co., inc.

1595 oakton, elk grove village, illinois 60007, 312-640-7890

June 18, 1981

Ms. Sandra S. Gardebring
Director, Enforcement Division
Region V, U.S. Environmental Protection Agency
230 S. Dearborn St.
Chicago, Il. 60604

Re: Complaint & Findings of Violation
Acme Finishing Co., Inc.
EPA ID No. ILD 005087812

Dear Ms. Gardebring:

This Letter shall serve as notification that Acme Finishing Co., Inc. has achieved compliance with the orders set forth in the "Complaint and Findings of Violation" issued by your office in docket No. V-W-81-R-83.

All of the documents prepared to achieve compliance with the order are on file at our facility.

Very truly yours,

ACME FINISHING CO., INC.

Dennis Walters

DW/gm

JUN 11 1981

SEWHME

Dennis Walters, Vice President
Acme Finishing Company, Incorporated
1595 Oakton Street
Elk Grove Village, Illinois 60007

RE: Waste Analysis Plan

Dear Mr. Walters:

Per your request of June 2, 1981, we are enclosing information on the preparation of a waste analysis plan as well as two examples of a waste analysis plan.

Hope the above-information will be of help in preparing your waste analysis plan. If you should have any questions regarding the above matters, please call me at (312) 886-6767.

Very truly yours,

DL

Douglas Lamb, Engineer
Water & Hazardous Materials
Enforcement Branch

Enclosure

bcc: DiDomenico/Lamb
Daggett

TD 6/11/81
DL 6-9-81

DLAMB/fw 06-09-81
6-6767

EJP 6/9/81

U.S. EPA

2.0 REGULATORY REQUIREMENTS

The general waste analysis requirements as given in §265.13 specify that any hazardous waste must be analyzed prior to its management and that an owner or operator of a hazardous waste management facility must develop and follow a written waste analysis plan. In addition, Subparts J through Q each contain special requirements for managing ignitable, reactive or incompatible wastes. The impact of these special requirements on waste analysis is examined. The facility specific requirements are presented for each of the types of facilities identified in Subparts J through Q in this section.

2.1 General Requirements

At a minimum, the waste analysis plan required under §265.13 must specify the following:

- The waste sampling method used to obtain a representative sample.
- The parameters selected for laboratory analysis for each waste, including those required in Subparts J through Q.
- The rationale for selection of these parameters for laboratory analysis.
- The methods or procedures applied during laboratory analysis.
- The frequency of sampling and analysis to be conducted on subsequent shipments of the same waste to ensure that the analysis is accurate and up to date.

For off-site facilities, the sampling method and procedure used to identify each movement of hazardous waste to ensure that the waste is the same as the one indicated on the accompanying manifest or shipping paper.

The owner or operator of a hazardous waste management facility must keep a waste analysis plan available for inspection by EPA personnel during the interim status period. A waste analysis plan must be included with Part B of a permit application as required under 40 CFR 122.25. Should the permit writer wish to evaluate a waste analysis plan, guidance is presented in subsequent sections of this document to assess each component of the plan.

Similarly, waste analysis results and data must be recorded by the owner or operator and be accessible to EPA personnel during the interim status period. Analytical data must be included with a Part 3 permit application. Guidance on the evaluation and interpretation of analytical data is presented in the various facility specific guidance manuals and is not provided in this document.

The owners or operators of a hazardous waste management facility must include provisions in their waste analysis plans to detect ignitability, reactivity, or incompatibility in any waste managed. Characteristics for ignitability and reactivity are defined in §261.21 and 261.23, respectively, and examples of potentially incompatible wastes are provided in Appendix V of Part 265. Specific analytical methods to determine ignitability, reactivity, or incompatibility are discussed in Section 3 of this document.

February 3, 1981

Example I -

HAZARDOUS WASTE FILE

Pursuant to 40 CFR 265.13(b) General Waste Analysis, Company generates two hazardous wastes- K061 and formerly K063. These wastes are generated by vacuum filtration of clarifier underflows. The systems have lengthy detention times, thus automatically yielding representative samples negating the need of grab composite samples. Since the composition of the material is uniform, it is sufficient to sample and analyze the material on a semi-annual basis.

The samples will be taken pursuant to ASTM method D2234. The samples will be taken across the face of the vacuum drum filter on a grab basis for an eight hour period. The container will be sealed between sample collections to prevent moisture loss.

The K061 waste (emission control dust/sludge from the electric furnace production of steel) will be analyzed for the following constituents using the appropriate standard method.

<u>SPECIES</u>	<u>SAMPLE PREPARATION</u>	<u>MEASUREMENT TECHNIQUE</u>	<u>METHOD</u>
Cadmium	Digestion	Atomic Absorption Fce/Flame	Std.Method #129A
Lead	"	"	"
Zinc	"	"	"
Iron	"	Colorimetric	ASTM Method #E277
% Moisture	See Method	Weight Difference	Std.Method #224A
Chromium, Hexavalent	"	Colorimetric	Std.Method #302B

The former K063 waste (sludge from lime treatment of spent pickle liquor from steel finishing operations) will be analyzed for the following constituents.

<u>SPECIES</u>	<u>SAMPLE PREPARATION</u>	<u>MEASUREMENT TECHNIQUE</u>	<u>METHOD</u>
Lead	Digestion	Atomic Absorption Fce/Flame	Std.Method #129A
Zinc	"	"	"
Iron	"	Colorimetric	ASTM Method #E277
% Moisture	See Method	Weight Difference	Std.Method #224A
Chromium, Hexavalent	"	Colorimetric	Std.Method #307B

The above waste constituents were chosen as they are the major portion of the listed wastes. No chemical or physical process is involved in filling the hazardous materials; therefore, the above information will be sufficient.

df

EXHIBIT A

Date: November 19, 1980

Example II-

WASTE ANALYSIS PLAN

1. Facility Name:

Refinery

2. Facility Address:

Mailing
address:

3. List of Wastes Analyzed:*

1. FCC Elutriator Catalyst
2. WTP Vacuum Filter Cake or "mud. box"
3. Copper Chloride/Clay Slurry from Linde Treater
4. Waste Oxidized Asphalt
5. DEA/MEA Precoat Filter Cake
6. Spent ZnO Catalyst
7. TIU Shutdown Sludge
8. Sludge from 776-777 Tks. (Heavy Cracked Slop Storage)
9. Sludge from Coke Fines Pit
10. Auxiliary Pond Sludge

(details
given on
pages 3 thru 5)

*A waste analysis program will be included for each waste listed.

Date: November 19, 1980

WASTE ANALYSIS PLAN (Con't.)

1. Facility Name:

2. Facility Address:

3. List of Wastes Analyzed:*

- 11. Leaded gasoline tank bottoms
- 12. Turbine Fuel Filter Cake
- 13. Low Temperature Shift Catalyst
- 14. Waste Activated Sludge
- 15. Chromate Sludge from cooling towers
- 16. Oily Sludge from cooling towers
- 17. Lake Bottoms
- 18. Skimmings from turbine fuel salt coalescer
- _____
- _____
- _____

*A waste analysis program will be included for each waste listed.

Example of one waste

WASTE ANALYSIS PLAN
GENERAL REQUIREMENTS

1. Waste Identification: Coker Containment Pit Sludge -- coke fines,
hydrocarbon, etc. which accumulate in the coke fines conveying system.

(Describe source and characteristics of waste; for example, API separator sludge or waste off-specification polymerized solids.)

2. This waste is considered to be hazardous based on:

- ☒ §261, Subpart C Tests (complete Item 3)
☐ §261, Subpart D Listed Wastes (complete Item 4)

3. This waste will be tested or reviewed at a minimum ~~every~~ of every six months
(Insert time interval; for example, 1 year, 6 months, etc. Test also
may be listed as not applicable.) for the following:

Ignitability:

Test method: Setaflash Closed Cup Tester ASTM D3278-78

Rationale for test and frequency: Hydrocarbons in sludge,
sampling prior to clean-outs.

Corrosivity:

Test method: _____

Rationale for test and frequency: _____

Reactivity:

Test method: _____

Rationale for test and frequency: _____

EP Toxicity:

Test method: Appendix II of Part 261

Rationale for test and frequency: Potential for metals, esp.
arsenic.

4. This waste consists of or contains the following wastes listed in §261, Subpart D (prefixes F, K, U, or P):

5. Tests which will be repeated or reviewed at a minimum of every six months (insert time interval) are:

<u>Test Name</u>	<u>Test Method</u>	<u>Rationale for Inclusion</u>
Total Solids %	Glass Fiber Filtration	For determination of disposal method
Oil Content %	Freon Extraction	For determination of disposal method
Water Content %	By Difference	For determination of disposal method
Total Dissolved Solids		
Chloride		
Iron		
Manganese		
Phenols		
Sodium		
Sulfate		
Total Organic Carbon		
Chemical Oxygen Demand		
pH		
Others (specify):		
Ignitibility	see previous sheet	
EP Toxicity	see previous sheet	
Metal	Atomic Absorption	

Rationale for sampling frequency: Prior to clean-out and disposal.

6. Circumstances which will cause analyses to be repeated more frequently than identified are significant changes in:
- x(a) The processes or activities generating the waste;
 - (b) The addition or deletion of materials to the waste (for mixtures);
 - (c) The methods or facilities used for storage, treatment, or disposal of the waste or significant changes in the effectiveness of treatment or disposal; and
 - (d) The pertinent characteristics of the waste with respect to storage, treatment, or disposal.

7. Representative samples of this waste will be obtained as follows:

Test Methods for the Evaluation of Solid Waste, Physical/Chemical

Methods.

(Specify sampling location(s) and method(s) of sample collection by description or reference to Appendix I, Part 261, Representative Sampling Methods.)

8. This waste is stored, treated, and disposed of as follows:

This waste is transported to and disposed of at



finishing co., inc.

1595 oakton, elk grove village, illinois 60007, 312-640-7890

June 2, 1981

Ms. Sandra S. Gardebring
Director, Enforcement Division
Region V, U.S. Environmental Protection Agency
230 S. Dearborn St.
Chicago, Il. 60604

Re: Complaint & Findings of Violation
Acme Finishing Co., Inc.
EPA ID No. ILD 005087812

Dear Ms. Gardebring:

This letter shall serve as notice that Acme Finishing Co., Inc. intends to comply with the orders set forth in the "Complaint and Findings of Violation" issued by your office to us in docket No. V-W-81-R-83.

Specifically, we will take the following corrective actions:

1. We will prepare and follow a waste analysis plan at our facility.
2. We will post "Danger-Unauthorized Personnel Keep Out" signs at the entrance to our hazardous waste storage area.
3. We will develop a schedule for the inspection of our waste storage area and its contents.
4. We will prepare an inspection log so that records of the inspections can be maintained.
5. We will prepare and maintain training records on current personnel.
6. "No Smoking" signs will be posted at the entrance to our hazardous waste storage area and also in close proximity to drums containing ignitable waste.
7. A written contingency plan will be prepared and followed at our facility.
8. We will distribute copies of our contingency plan to all local police departments, fire departments, hospitals and state and local emergency response teams that may be called upon to provide emergency service. Copies of the contingency plan will also



finishing co., inc.

1595 oakton, elk grove village, illinois 60007, 312-640-7890

be maintained at our facility.

9. One person, as well as an alternate, will be designated as emergency coordinator and will have full authority to commit the resources needed to carry out the contingency plan.

Unless there are any unforeseen problems in carrying out the above actions, we should achieve compliance within the 30 day compliance period allotted to us. As requested by your office, upon achieving compliance with your ORDER, we will notify your office.

Very truly yours,

ACME FINISHING CO., INC.

Dennis Walters

DW/gm

RECEIVED

MAY 1 9 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5EWHME

Dennis W. Walters, Vice President
Acme Finishing Company, Incorporated
1595 Oakton Street
Elk Grove Village, Illinois 60007

V-W- 81-R-083

Re: Complaint and Findings of Violation
Acme Finishing Company, Incorporated
Elk Grove Village, Illinois
EPA ID No. IL D 005087812

Dear Mr. Walters:

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act (RCRA), as amended, 42 USC § 6901 et seq. based on an inspection of your facility at 1595 Oakton Street, Elk Grove Village, Illinois, on January 29, 1981, by the Illinois Environmental Protection Agency.

The Compliance Order states the reason for such a determination, establishes a compliance schedule and advised that you may be liable for civil penalties should you fail to meet the time specified in the Order for corrective actions. This Compliance Order is issued pursuant to Section 3008 of RCRA (42 USC § 6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing and a copy of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits." It is recommended that the enclosed Compliance Order and Rules of Practice, 40 CFR Part 22, 45 Fed. Reg. 24360 (April 9, 1980), as amended by 45 Fed. Reg. 79808 (December 2, 1980), be carefully read and analyzed to determine the alternatives available in responding to the Order and opportunity for a hearing. Should you desire to contest the Compliance Order, a written request for a hearing is required 30 days from receipt of this Compliance Order.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of the Compliance Order, you are extended an opportunity to request an informal settlement conference. If you have any questions or desire to request an informal conference for purpose of settlement with Enforcement Division Staff, please contact Douglas Lamb,

RECEIVED
MAY 14 1981
U.S. ENVIRONMENTAL
PROTECTION AGENCY
REGION V
Regional Hearing Clerk

Enforcement Division, Water & Hazardous Materials Enforcement Branch,
230 South Dearborn Street, Chicago, Illinois 60604. Phone number is
(312) 886-6767.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: John S. Moore, Manager
Division of Land/Noise
Pollution Control
Illinois Environmental Protection
Agency

Paul Biebel, Chief
Environmental Control Division
Illinois Attorney General's Office

bcc: Region V, Compliance Section, Donaldson/Doug Farnsworth, Acting Chief
Regulatory Branch
Office of Hazardous Waste
Enforcement (EN-335)

Hak Cho
State Implementation Officer

Leder
DiDomenico/Lamb
Daggett

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

IN THE MATTER OF:	REGION V	
)	
)	DOCKET NO. V-W-81-R-83
)	
ACME FINISHING COMPANY, INC.)	
ELK GROVE VILLAGE, ILLINOIS)	COMPLAINT AND
)	FINDINGS OF VIOLATION
)	
EPA ID NO. IL D 005087812)	

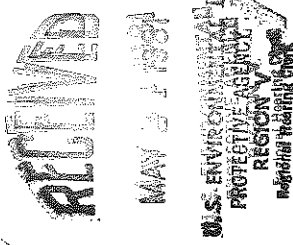
This Complaint is issued pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 USC § 6928, and is equivalent to a Compliance Order referred to in that Section. The Complainant is the Director, Enforcement Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is the Acme Finishing Company, Inc. and has a place of business located at 1595 Oakton Street, Elk Grove Village, Illinois 60007.

Pursuant to 42 USC § 6928(a) and based on a compliance inspection conducted by the Illinois Environmental Protection Agency (IEPA) on January 29, 1981, it has been determined that the above named Respondent is in violation of RCRA. Specifically, it has been determined that Acme Finishing Company, Inc. is in violation of Subtitle C of RCRA, Section 3005 of 42 USC § 6925 and implementing regulations 40 CFR, Parts 265.13(b), 265.14(c), 265.15(b), 265.15(d), 265.16(e), 265.17, 265.51, and 265.55.

FINDINGS

This determination is based on the following findings of violation.

1. The facility, located at 1595 Oakton Street, Elk Grove Village, Illinois, was inspected by the (IEPA) on January 29, 1981. The Respondent has applied for a permit to operate this facility as a hazardous waste facility under RCRA. It was represented to the IEPA inspector on the date of the inspection that the facility is involved with generation and storage of hazardous wastes as defined in 40 CFR Part 261.
2. Pursuant to 40 CFR § 265.13(b), the owner/operator is required to have a written waste analysis plan on file at the facility. At the time of the inspection, the owner/operator was unable to produce such a waste analysis plan as required by 40 CFR § 265.13(b).



3. Pursuant to 40 CFR § 265.14(c), unless exempt under paragraphs (a)(1) and (a)(2) of this Section, the owner/operator is required to post a sign with a legend, "Danger--Unauthorized Personnel Keep Out," at each entrance to the active portion of a facility, and at other locations in sufficient numbers to be seen from any approach to this active portion. At the time of the inspection, no such "Danger" signs had been posted as required by 40 CFR § 265.14(c).
4. Pursuant to 40 CFR § 265.15(b), the owner/operator is required to develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards. At the time of the inspection, the owner/operator was unable to produce such a written schedule as required by 40 CFR § 265.15(b).
5. Pursuant to 40 CFR § 265.15(d), the owner/operator is required to record inspections in an inspection log or summary. At the time of the inspection, the owner/operator was unable to produce such an inspection log or a summary as required by 40 CFR § 265.15(d).
6. Pursuant to 40 CFR § 265.16(e), the owner/operator is required to maintain training records on current personnel until closure of the facility. At the time of the inspection, the owner/operator was unable to produce such a training record as required by 40 CFR § 265.16(e).
7. Pursuant to 40 CFR § 265.17, the owner/operator is required to take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes. At the time of the inspection, the IEPA found that "No Smoking" signs were not conspicuously placed wherever there is a hazard from ignitable or reactive wastes as required by 40 CFR § 265.17.
8. Pursuant to 40 CFR § 265.51, the owner/operator is required to have a contingency plan for the facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. At the time of the inspection, the owner/operator was unable to produce such a contingency plan as required by 40 CFR § 265.51.

9. Pursuant to 40 CFR § 265.55, the owner/operator is required, at all times, to have at least one employee either on the facility premises or on call with the responsibility for coordinating all emergency response measures and have the authority to commit the resources needed to carry out the contingency plan. At the time of the inspection, the owner/operator was unable to identify such an emergency coordinator for the facility.

ORDER

IT IS HEREBY ORDERED that Acme Finishing Company, Inc. take the following corrective actions for its Elk Grove Village, Illinois, facility within the specified times for achieving compliance with Subtitle C of RCRA, Section 3005, 42 USC § 6925 and implementing regulations 40 CFR Parts 265.13(b), 265.14(c), 265.15(b and d), 265.16(e), 265.17, 265.51, 265.53, and 265.55.

1. The owner/operator, within 15 days of receipt of this Order, shall submit to the Director, Enforcement Division, Region V, U.S. EPA, Attention: Water and Hazardous Materials Enforcement Branch, Compliance Section, at 230 South Dearborn Street, Chicago, Illinois 60604, the following:
 - a. a written notification of intent to comply with this Order;
 - b. a written detailed explanation of the steps to be taken to achieve compliance with this Order.
2. The owner/operator, within 30 days of receipt of this Order, shall achieve compliance with the following requirements:
 - a. a waste analysis plan shall be prepared and followed at the facility;
 - b. "Danger - Unauthorized Personnel Keep Out" signs shall be posted at each entrance to the active portion of the facility, and at other locations to be seen from any approach to the active portion;
 - c. a written schedule for inspection of equipment and devices shall be prepared and followed at the facility;

- d. an inspection log or summary shall be prepared and maintained to record inspections made at the facility;
 - e. training records on current personnel shall be prepared and maintained at the facility;
 - f. "No Smoking" signs shall be conspicuously placed wherever there is a hazard from possible ignitable or reactive waste;
 - g. a written contingency plan shall be prepared and followed at the facility;
 - h. copies of the contingency plan shall be distributed to all local police departments, fire departments, hospitals, state and local emergency response teams that may be called upon to provide emergency services, and a copy shall also be maintained at the facility;
 - i. a person or persons shall be designated as emergency coordinator with the full authority to commit the resources needed to carry out the contingency plan.
3. The owner/operator shall notify the U.S. EPA in writing upon achieving compliance with this Order, and any part thereof. This notification shall be submitted to Director, Enforcement Division, Region V, U.S. EPA, Attention: Water & Hazardous Materials Enforcement Branch, Compliance Section, at 230 South Dearborn Street, Chicago, Illinois 60604.

POTENTIAL CIVIL PENALTY

Failure to comply with any requirement of this Compliance Order shall subject the above named Respondent to liability for a civil penalty of up to \$25,000.00 (TWENTY FIVE THOUSAND DOLLARS) per day of continued noncompliance. U.S. EPA is authorized to assess such penalties pursuant to Section 3008(a)(3) of RCRA.

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent is hereby notified that the above Order shall become final unless said Respondent has requested in writing a public hearing on the Order no later than 30 days from the date this Order is served. Respondent has the right to request a hearing to contest any factual allegation set forth in the Complaint or the appropriateness of any proposed compliance schedule or penalty. In the event of requesting a hearing and to avoid having the Compliance Order become final without further proceedings, Respondent must file a written answer to this complaint with the Regional Hearing Clerk, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days of receipt of this notice. A copy of this answer and any subsequent document filed in this action should also be sent to Enforcement Division, Attention: Water and Hazardous Materials Enforcement Branch, Compliance Section, at the same address. Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of facts which constitute the grounds of defense, and (2) a concise statement of the facts intended to be placed at issue in the hearing. The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing.


A copy of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits" (40 CFR § 22, 45 Fed. Reg. 24363 as amended by 45 Fed. Reg. 79808), accompanies this Complaint. These regulations are applicable to this administrative action.

SETTLEMENT CONFERENCE

Whether or not a hearing is requested, Respondent may confer informally with U.S. EPA concerning (1) whether the alleged violations in fact occurred as set forth above, (2) the appropriateness of the compliance schedule, (3) the appropriateness of any proposed penalty in relation to the size of the business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal

settlement conference at any time by contacting this office. However, any such request will not affect the thirty-day time limit for requesting a formal hearing on the violations alleged herein. U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences.

Dated this 18th day of May, 1981.



Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental Protection Agency
Region V

RCRA ENFORCEMENT ACTION SIGN-OFF

V-W-81-R-83

PART I. BACKGROUND

FACILITY NAME

Acme Finishing Company, Inc.

FACILITY LOCATION

Elk Grove Village, Illinois

RCRA ID NUMBER

IL D 005087812

NATURE OF VIOLATION

waste analysis plan, "Danger" signs, inspection schedule, inspection log, training records, "No Smoking" signs, contingency plan, & emergency coordinator.

PART II. RECOMMENDATION

Issue a RCRA Compliance Order.

TYPE OF ACTION

NAME & DATE OF STATE CONTACT NOTIFIED

MAILED 5/19/81-18.

ANY OTHER OUTSTANDING ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER

None

AIR

None.

PART III. CONCURRENCES

	INITIALS	DATE	AGREE	DISAGREE
PREPARER TECHNICAL	DR	4 (21) 81	(✓)	()
LEGAL	TD	4 (21) 81	(✓)	()
CHIEF, ENGINEERING UNIT	ELD	4 (22) 81	(✓)	()
CHIEF, ENGINEERING SECTION	WHM	5 (4) 81	(X)	()
CHIEF, COMPLIANCE SECTION	MBforAL	5/4/81	(X)	()
CHIEF, CASE DEVELOPMENT UNIT	GES	5 (4) 81	(X)	()
CHIEF, LEGAL SECTION	Rmg	5 (4) 81	(X)	()
CHIEF, WATER & HAZ. MAT. ENF.BR.	KAF	(X)	(X)	()

PART IV. APPROVAL

DIRECTOR, ENFORCEMENT DIVISION

APPROVES ()

DISAPPROVES ()

Final Filter to T. Cavanaugh 101514 MAY 81
KAF

Date: **24** MAR 1981

Referral Number: ILH-81-46

Region V Site No: ILN 005087612

HAZARDOUS WASTE REFERRAL

Contacts

mg/s/1 Philip Kurlan RC
Compliance Section

Lemo
Engineering Section

Daggett
Legal Section

Site Name: Acme Finishing Company, Inc.

Site Location: 1595 Oakton
Elk Grove Village, Illinois 60007

Owner/Operator: Dennis W. Walters, Vice President

Permitted Site:

Permit Number & Issue Date (if applicable):

Apparent Violations: No waste Analysis Plan on file at facility - viol. of §265.13(6)
No "Danger signs" at entrance - viol. of §265.14(c)
Operator inspections lacking - viol. of §265.15
No Personnel Training Records - viol. of §265.16
cial requirements ignitable materials not addressed - viol of §265.17
No Contingency Plan - viol. of Subpart D

List Supporting Documentation
(MDR's, Letters, Reports, Phone Memos, Field Surveys, Photographs, etc.)

RCRA ISS inspection conducted on 1/29/81 by the State.

List Previous violations and subsequent action taken:

None known

Compliance Section Recommendations:

Prepare Compliance Order.

Technical Evaluation and Action Development
(To be filled out by Engineering Section)

Date Received: _____

Assigned to: _____

Date Evaluation and Action Development
to be Completed: _____

Additional Contacts/Documentation Developed
(including phone memos to or from permittee and to or from State):

Engineering Section Recommendation:

Specify, Develop and Attach Action Documents:
(including cover memos)

Legal Evaluation
(To be filled out by Legal Section)

Date Received: March 30, 1981
Assigned to: Douglas Lamb
Date Review to be Completed: _____

Additional Contacts/Documentation Developed
(including phone memos to or from permittee and to or from State):

Legal Section Recommendation:

REMARKS
(To be filled out as appropriate)

ACTION INITIATED
(To be filled out by Compliance Section)

TYPE OF ACTION: _____
Date INITIATED: _____
DATE CLOSED OUT: _____

121 MAR 1981

SEWHME

Dennis W. Walters, Vice-President
Acme Finishing Company, Inc.
1595 Oakton
Elk Grove Village, Illinois 60007

Re: Acme Finishing Company
Elk Grove Village, Illinois
ILD005087812

Dear Mr. Walters:

A representative of the Illinois Environmental Protection Agency (IEPA) inspected your facility on January 29, 1981. This report is forwarded for your information.

If you have any questions concerning this inspection report, please contact Mr. Philip Kaplan of the Water & Hazardous Materials Compliance Section at (312) 353-2114.

Very truly yours,

Original Signed by: Arnold E. Leder

Arnold E. Leder
Chief, Compliance Section
Water & Hazardous Materials
Enforcement Branch

PKaplan/ng 3-19-81 (6-6715)

Gingher N.Y. 3-19-81
Kaplan PK 3-19-81
Baumgartner WB 3-19-81
Bowman Y.B.
Leder AL

Enclosure

cc: Jack Moore, Director
Division of Land/Noise Pollution
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baumgartner/Lewis
Benning - IEPA, Maywood
Kaplan

RECEIVED

MAR 02 1981

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

265.

I. General Information:

(A) Facility Name: ACME FINISHING COMPANY INC.
(B) Street: 1595 OAKTON
(C) City: EIK GROVE (D) State: ILL. (E) Zip Code: 60007
(F) Phone: 640-7890 (G) County: Cook
(H) Operator: SAME
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: SAME
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____
(V) Type of Ownership: _____ Federal _____ Municipal ☒ Private
_____ State _____ County
(W) Date of Inspection: 1/29/81 (X) Time of Inspection (From) 1:30 pm (to) 2:30 pm
(X) Weather Conditions: 30° Sunny

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MAR 03 1981

WASTE MANAGEMENT BRANCH
REGION V

(A) Interviewed Dennis W. Valters VICE-PR. ident 690-7890
 Telephone

(Z) Inspection Participants
BRAO BENNING EPSI 345-9780
 Title Telephone

II. Description of Site Activity

- (A) ☒ Generator (Form 2)
- (B) ☐ Transporter (Form 3)
- (C) ☐ Chemical, Physical and Biological Treatment (Form 4)
- (D) ☒ Storage (Form 5)
- (E) ☐ Landfill (Form 6)
- (F) ☐ Incineration (Form 7)
- (G) ☐ Land Treatment (Form 4)
- (H) ☐ Thermal Treatment (Form 7)

(I) Comments: Generate F001, F003, F005, F017, F018
provide custom paint finishes for metal
products.

Supplemental forms (listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

265 Subpart B

	as	No	Not Inspected	See Remark Number
A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		✓		
2. Transfer of Ownership?		✓		
B) General Waste Analysis:				
1. Has the owner ^{or} operator obtained a detailed chemical and physical analysis of the waste?	✓			/
2. Does the owner ^{or} operator have a detailed waste analysis plan on file at the facility?		✓		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		✓		
C) Security - Do security measures include:				
1. 24-Hour Surveillance?		✓		
2. Artificial or Natural Barrier Around Facility?	✓			
3. Controlled Entry?	✓			
4. Danger Sign(s) at Entrance?		✓		
D) Do Owner ^{or} Operator Inspections Include:				
1. Records of Malfunctions?		✓		
2. Records of Operator Error?		✓		
3. Records of Discharges?		✓		
4. Inspection Schedule?		✓		
5. Safety, Emergency Equipment?		✓		
6. Security Devices?		✓		
7. Operating and Structural Devices?		✓		
8. Inspection Log?		✓		

① ILL. Supplemental Permits

Yes

No

Not
InspectedSee Remark
Number(E) Do Personnel Training Records
Include:1. Job Titles? ✓ 2. Description of Training? ✓ 3. Records of Training? ✓ Is Personnel Training Completed
within the Required Time Frame? ✓ (F) Are the Following
Special Requirements for
Ignitable, Reactive, or
Incompatible Wastes Addressed?1. Special Handling? ✓ 2. No Smoking Signs? ✓ 3. Separation and
Confinement? ✓ IV. PREPAREDNESS AND PREVENTION(A) Maintenance and Operation
of Facility:1. Is there any evidence of fire,
Explosion, or release of
hazardous waste or hazardous
waste constituent? ✓ (B) Does the Facility Have
the Following Equipment:1. Alarm System? ✓ 2. Telephone or 2-Way Radios? ✓ 3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment? ✓

Indicate the volume of water and/or foam available for fire control;

Units: Sprinkler System - hoses City water

	No	Not Inspected	See Remark Number
(C) Testing and Maintenance of Emergency Equipment:			
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	<input checked="" type="checkbox"/>		
2. Is Emergency Equipment Maintained in Operable Conditions?	<input checked="" type="checkbox"/>		
(D) Has Owner ^{or} Operator Provided Immediate Access to Internal Alarms (if needed)?	<input checked="" type="checkbox"/>		
(E) Is there Adequate Aisle Space for Unobstructed Movement?	<input checked="" type="checkbox"/>		
(F) Are Arrangements with Local Authorities Included in the Operating Record?	<input checked="" type="checkbox"/>		

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES

- (A) Does the Contingency Plan Contain the
Following Information:
1. The actions facility personnel
must take to comply with
§264.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part.)
 2. Arrangements agreed to by local
police departments, fire departments,
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §264.37?

<input checked="" type="checkbox"/>		
<input checked="" type="checkbox"/>		

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	_____	_____✓_____	_____	_____
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	_____	_____✓_____	_____	_____
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)	_____	_____✓_____	_____	_____
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?	_____	_____✓_____	_____	_____
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	_____	_____✓_____	_____	_____
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	_____	_____✓_____	_____	_____
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____✓_____	_____	_____
(D) Emergency Procedures				
If an Emergency Situation has occurred at this facility, has the Emergency Coordinator followed the Emergency procedures listed in 256.56?	_____	_____N/A_____	_____	_____

VII. MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Are records of past shipments retained for 3 years?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

VIII. CLOSURE AND POST CLOSURE

(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Has this plan been submitted to the Regional Administrator?	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
3. Has Closure begun?	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
4. Is closure cost estimate available by May 19, 1981?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(B) Post Closure Care and Use of Property				
- Has the Owner/Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	<u> </u>	<u> </u>	<u> </u>	<u> </u>

IL0005087812
EPA IDENTIFICATION NUMBER

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RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection

EPA - D.L.P.C.
STATE OF ILLINOIS

1. General Information:

- (A) Installation Name: Acme Finishing Company Inc
- (B) Street: 1595 Oakton
- (C) City: Elk Grove (D) State: ILL. (E) Zip Code: 60007
- (F) Phone: 640-7890 (G) County: Cook
- (H) Operator: SAME
- (I) Street: _____
- (J) City: _____ (K) State: _____ (L) Zip Code: _____
- (M) Phone: _____ (N) County: _____
- (O) Owner: SAME
- (P) Street: _____
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- _____ Federal _____ Municipal ☒ Private
- (V) Type of Ownership: _____ State _____ County
- (W) Date of Inspection: 1/29/81 Time of Inspection (From) 1:30 pm (To) 2:30 pm
- (X) Weather Conditions: 30° Sunny

(Y) Person(s) Interviewed

Title

Telephone

Dennis W. Walters

Vice President

640-7890

(Z) Inspection Participants

Title

Telephone

BRAD Benning

EPS I

312/345-9780

11. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

(A) Transporter (Form 3)

(B) Chemical, Physical and
Biological Treatment (Form 4)

(C) X Storage (Form 5)

(D) Landfill (Form 6)

(E) Incineration (Form 7)

(F) Thermal Treatment (Form 7)

(G) Comments: FO17, FO18

Spraying booths, and strip tanks.

FO03, FO05 - sent out to recycler

FO01 - from vapor degreaser.

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(B) Does the Manifest contain the following information:				
1. Manifest document number?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Name, mailing address, telephone number, and EPA ID Number of Generator?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. Name and EPA ID Number of Transporter(s)?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
7. Required Certification?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
8. Required Signatures?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(C) Does the Owner or Operator Submit Exception Reports when Needed?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is Generator Packaging waste in accordance with DOT Regulations?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
(C) If required, are placards available to transporter?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>

	Yes	No	Not Inspected	See Remark Number
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>
4. Are wastes stored in tanks managed according to the following:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
c. Do continuous feed systems have a waste-feed cutoff?	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
d. Are required daily and weekly inspections done?	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	<u>N/A</u>	<u> </u>	<u> </u>	<u> </u>

5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards? _____

A Do Personnel training records include: _____

1. Job Titles? _____ ✓

2. Description of Training? _____ ✓

3. Records of Training? _____ ✓

Is Personnel Training Completed within the Required Time Frame? _____ ✓

B. Preparedness and Prevention

1. Maintenance and Operation of Facility:

a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? _____ ✓

2. Does the Facility have the following equipment?

a. Alarm system? _____ ✓

b. Telephone or 2-Way Radios? _____ ✓

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment? _____ ✓

Indicate the volume of water and/or foam available for fire control

Units: - Sprinkler System - Hoses - City water

3. Testing and Maintenance of Emergency Equipment:

a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment? _____ ✓

b. Is emergency equipment Maintained in Operable Condition? _____ ✓

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Is there adequate Aisle Space for unobstructed Movement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are arrangements with local authorities included in the operating record?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Contingency Plan and Emergency Procedure				
1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Names, addresses, and Phone numbers (office and home) of all persons qualified to act as emergency coordinator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	_____	<u>✓</u>	_____	_____
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?	_____	<u>✓</u>	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	<u>✓</u>	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	<u>✓</u>	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	<u>N/A</u>	_____	_____	_____

V. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?

✓

VI. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?

✓

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, has a generator:
 - a. Notified the Administrator in writing?
 - b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

Yes

No

Not
InspectedSee Remark
Number

c. Met the Manifest requirements? _____

2. Importing Hazardous Waste,
has the generator:

a. Met the manifest requirements? _____

VII. PREPARER INFORMATIONName: BRAD BENNINGTitle: EPS IPhone Number: 312/345-9780

REMARKS: Provides a custom paint finishing service for manufactures of diversified metal products. The paint Sludges they generate from their spray booths and Stripper tanks are taken to Joliet/ESL for disposal, The wash solvents are taken to Rockford Acme Solvents for recycling. They are using the ILL. Suppl. Permits and Manifests. The storage of this material, is by containerization in closed drums, located outside in a fenced-in area approx. 30'x10'. The area is paved and located west of the plant.

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RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

EPA - D.L.P.C.
STATE OF ILLINOIS

I. General Information

(A) Facility Name: Acme FINISHING Company Inc
(B) Street: 1595 Oakton
(C) City: EIK GROVE (D) State: ILL (E) ZIP Code 60007
(F) Date of Inspection: 312-640-7890

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT IN- SPECTED	REMARK #
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?	✓			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	✓			
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	✓			
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	✓			

B. Facilities which store hazardous waste in tanks (Subpart 1)

None

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				

Continued on next page

	YES	NO	NOT INSPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

C. Facilities which store hazardous waste in surface impoundments (Subpart K) *None*

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

D. Facilities which store hazardous waste in waste piles (Subpart L) *None*

1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

	YES	NO	NOT IN-SPECTED	REMARK #
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

C. Facilities which store hazardous waste in surface impoundments (Subpart K) *None*

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective cover?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)				

D. Facilities which store hazardous waste in waste piles (Subpart L) *None*

1. Are waste piles covered or protected from the wind?				
2. Is each in-coming movement of waste analyzed before being added to the waste pile?				
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1980.)				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				

Continued on next page

		NO	NOT IN- SPECTED	REMARK #
5. Are piles of reactive or ignitable waste protected?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 03144202

CO. - L.P.C.

Region #

Date

(20) / / (25)

Letter Sent (Yes or No)

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From 1 : 30 m

Ground Water() Surface() Other() To 2 : 30 m

Photos Taken: Yes () No () Interviewed

Inspector

(27)

(29)

Previous Inspection

Previous Correspondence

Site Open: Yes() No()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

Illegal (5) ()

(30)

(31)

IMPROVED

RECEIVED

SAME

MAR 02 1981

LPC 4 1/79 5,000

DETERIORATED

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

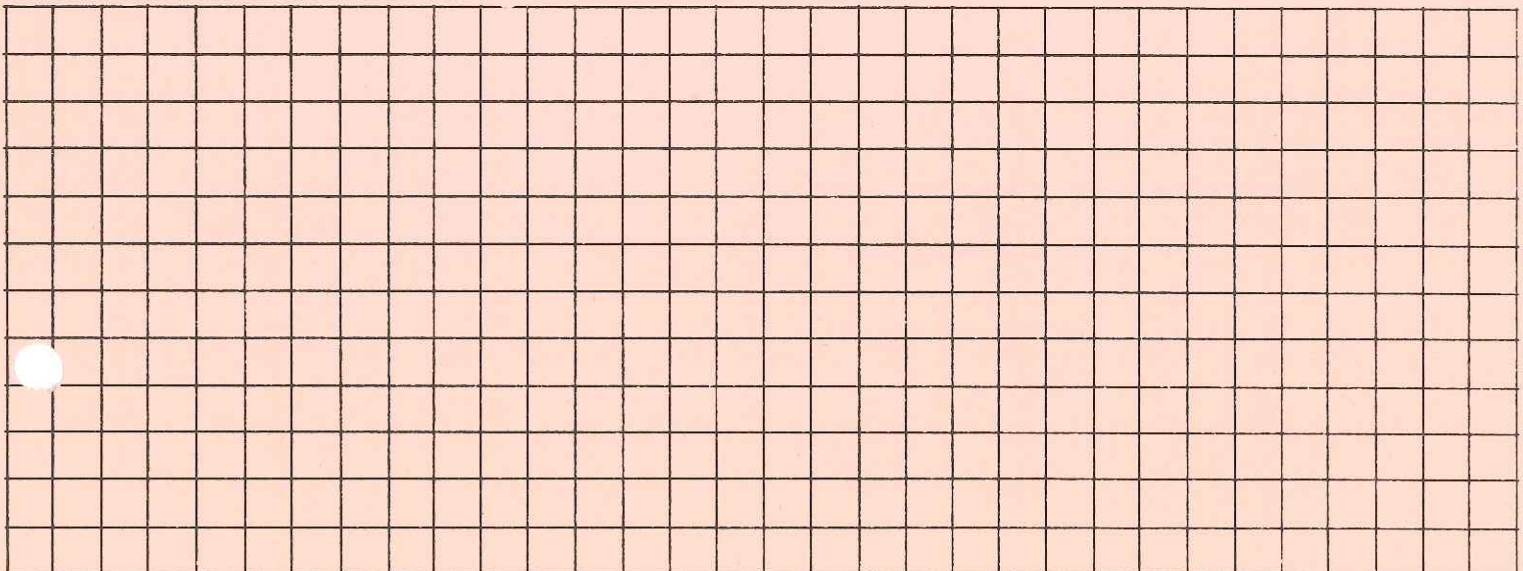
I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:



CONTINGENCY PLAN

for

ACME FINISHING CO. INC.
1595 Oakton St.
Elk Grove Village, Ill. 60007

PURPOSE OF THE PLAN:

Our contingency plan is designed to minimize hazards to human health or the environment from fire, explosion, or any unplanned release of hazardous waste or its constituents to the air, soil, or surface water.

IMPLEMENTATION OF THE PLAN:

The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or its constituents which could threaten human health or the environment.

INFORMATION REGARDING OUR HAZARDOUS WASTE:

Acme Finishing Co. is considered a hazardous waste storage facility because some of our waste materials are either flammable and/or toxic and/or corrosive. The following is a list of the waste materials temporarily stored at our site:

<u>DESCRIPTION</u>	<u>U.S. E.P.A. NO.</u>	<u>HAZARD</u>
Degreaser waste	F001	Toxic*
Waste Paint Solvent	F003/F005	Flammable
Spray Booth Sludge	F017	Toxic/Flammable
Hot Strip Tank Sludge	F017	Toxic/Corrosive**
Cold Strip Tank Sludge	F017/(F001)	Toxic/Corrosive**
Wastewater Treatment Sludge	F018	Toxic*

- * The toxic materials are considered toxic because of the presence of heavy metals, but must be taken internally to be dangerous to human health.
- ** Human contact with the corrosive materials could cause skin or eye burns.

CONTINGENCY PLAN EMERGENCY COORDINATOR:

Richard Kinsey, Plant Manager	Office: 640-7890
167 Tottenham Rd.	Home: 593-3478
Elk Grove Village, Ill. 60007	

Alternate:

Dennis Walters, Vice President	Office: 640-7890
5970 Andover Drive West	Home: 837-8913
Hanover Park, Ill. 60103	

PLANT EMERGENCY EQUIPMENT:

- Highhazard sprinkler system throughout entire plant.
- Fire alarm system activated by the opening of one or more sprinkler heads or the manual pull stations at the front and rear of the plant area. The fire alarm system is tied in to Wells Fargo security systems which would in turn notify the local fire department and the emergency coordinator.
- Fifteen (15) ABC type dry chemical fire extinguishers located throughout the plant area. (see attached plant diagram) (7-20lb.; 8-9½lb.)
- Two (2) CO₂ Type fire extinguishers (see attached plant diagram). (20lb.)
- Six (6) City water connected 75 ft. fire hoses. (see attached plant diagram)
- A first aid room equiped to treat minor injuries and minor chemical burns.

PLANT EVACUATION PLAN

Our plant facility is completely open on the inside with emergency exit doors located around the perimeter of the building. In the event of a fire or explosion, facility personnel are to evacuate the building via the nearest exit, away from the scene of the fire or explosion.

Should an evacuation be necessary, it would be announced over our public address system. The foreman of each department will be responsible for the safe evacuation of all of the people in his area.

ACTIONS REQUIRED OF PLANT PERSONNEL:

The greatest danger posed by our hazardous waste is fire or explosion of the waste paint solvent in the outside waste storage area. If a fire should start in this area, the following steps should be taken:

1. Call the fire department.
2. Determine if the fire is close to the sealed flammable liquid drums.
3. If the fire is not among these drums or dangerously close to them, members of our emergency fire brigade should attempt to extinguish the fire with portable dry chemical fire extinguishers.
4. If the fire is extensive and there is danger of drums exploding, do not get close to the fire. Instead, wait for the fire department. When they arrive, inform them of the potentially explosive containers in the storage area.

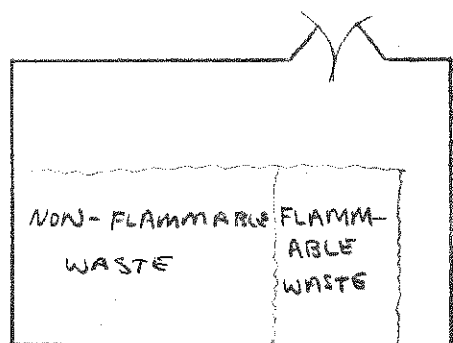
ACTIONS OF LOCAL FIRE AND POLICE DEPARTMENTS:

The actions of fire and police departments should be the normal response to a chemical fire. They should also be sure to check the storm water sewer system for the presence of any flammable liquids or vapors which could pose a potential hazard elsewhere.

Copies of emergency response guides developed by the Department of Transportation for some chemicals which are present in some of our hazardous waste are attached to this document.



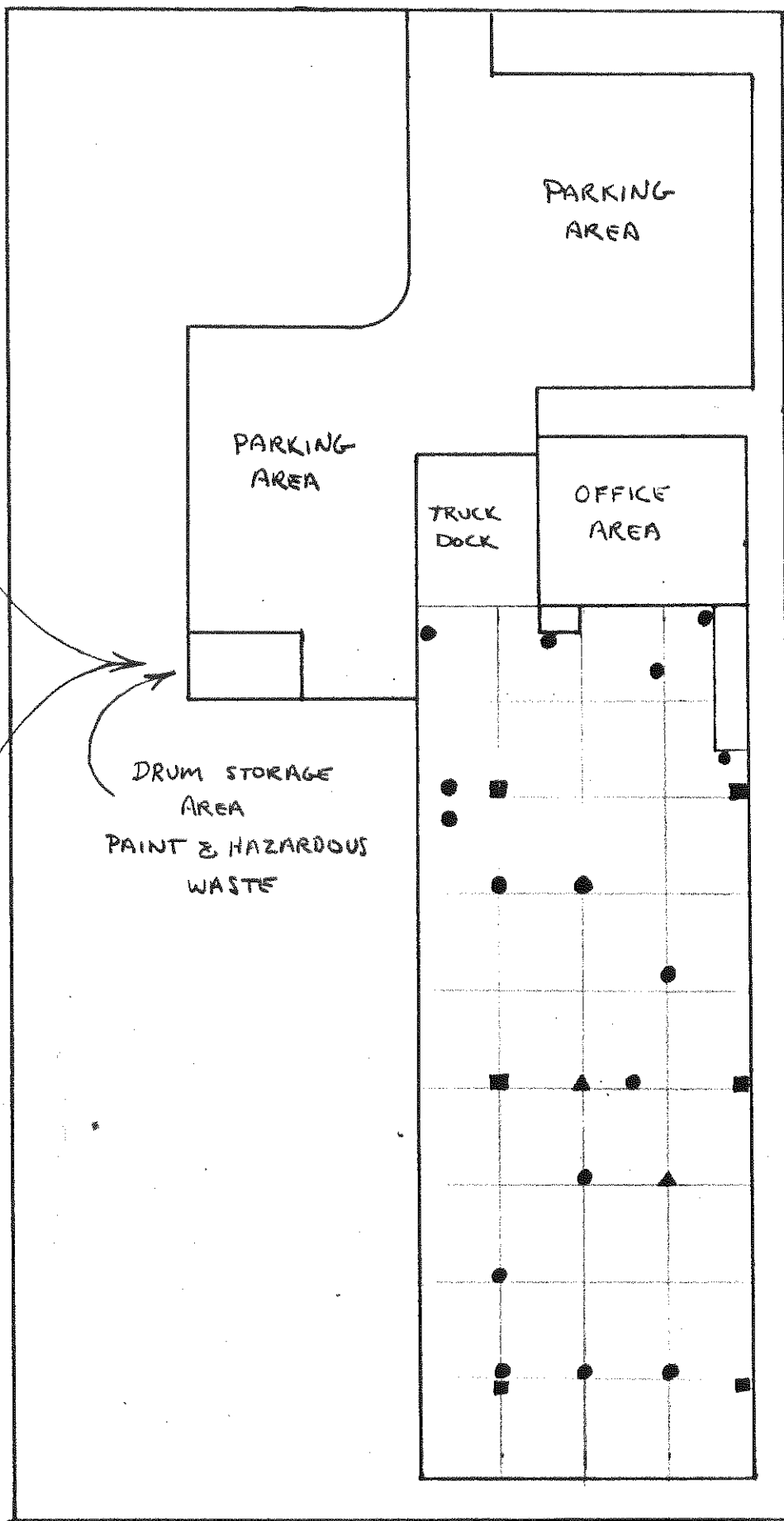
OAKTON



EXPANDED VIEW -
DRUM STORAGE
AREA

DRUM STORAGE
AREA
PAINT & HAZARDOUS
WASTE

- - INDICATES DRY CHEMICAL
FIRE EXTINGUISHER
- ▲ - INDICATES CO₂ TYPE
FIRE EXTINGUISHER
- - INDICATES FIRE HOSE



PROPERTY BOUNDARY 625. FT.

PROPERTY BOUNDARY 320. FT.

SCALE: 3/16" = 50. FT.

GUIDE 26 for PAINT, etc., FLAMMABLE LIQUID

PAINT IS PRESENT IN OUR SPRAY BOOTH SLUDGE

GUIDE 26

FIRE OR EXPLOSION

Will burn. May be ignited by heat, sparks and flames.
Flammable vapor may spread away from spill.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind; keep out of low areas.
Isolate hazard area and deny entry.
Wear self-contained breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank or tankcar is involved in fire.
FOR EMERGENCY ASSISTANCE CALL CHEMTREC (800) 424-9300.
Also, in case of water pollution, call local authorities.

FIRE

Small Fires: Dry chemical, CO2, water spray or alcohol foam.
Large Fires: Water spray, fog or alcohol foam.
Move container from fire area if you can do it without risk.
Stay away from ends of tanks.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles.
Withdraw immediately in case of rising sound from venting safety device or discoloration of tank.

SPILL OR LEAK

No flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand, or other noncombustible absorbent material, then flush area with water.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush skin and eyes with running water for at least 15 minutes.
Remove and isolate contaminated clothing and shoes.

From: DOT P 5800.2

GUIDE 27

OF TOLUENE, XYLENE, & NAPHTHA

THESE SOLVENTS ARE PRESENT IN OUR WASTE PAINT SOLVENT

HAZARD INFORMATION

Guide 27

FIRE OR EXPLOSION

Will burn. May be ignited by heat, sparks and flames.
Flammable vapor may spread away from spill.
Container may explode in heat of fire.
Vapor explosion hazard indoors, outdoors or in sewers.
Runoff to sewer may create fire or explosion hazard.

HEALTH HAZARDS

Vapors may cause dizziness or suffocation.
Contact may irritate or burn skin and eyes.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind; keep out of low areas.
Isolate hazard area and deny entry.
Wear self-contained breathing apparatus and full protective clothing.
Isolate for 1/2 mile in all directions if tank or tankcar is involved in fire.
FOR EMERGENCY ASSISTANCE CALL CHEMTREC (800) 424-9300.
Also, in case of water pollution, call local authorities.

FIRE

Small Fires: Dry chemical, CO2, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Stay away from ends of tanks.
Cool containers that are exposed to flames with water from the side until well after fire is out.
For massive fire in cargo area, use unmanned hose holder or monitor nozzles.
If this is impossible, withdraw from area and let fire burn.
Withdraw immediately in case of rising sound from venting safety device or discoloration of tank.

SPILL OR LEAK

No flares, smoking or flames in hazard area.
Stop leak if you can do it without risk.
Use water spray to reduce vapors.
Small Spills: Take up with sand, or other noncombustible absorbent material, then flush area with water.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
If not breathing, give artificial respiration.
If breathing is difficult, give oxygen.
In case of contact with material, immediately flush skin or eyes with running water or at least 15 minutes.
Remove and isolate contaminated clothing and shoes.

From: DOT P 5800.2

GUIDE 55

for METHYLENE CHLORIDE
& TRICHLOROETHYLENE

METHYLENE CHLORIDE IS PRESENT IN OUR COLD STRIP TANK SLUDGE
TRICHLOROETHYLENE IS PRESENT IN OUR DEGREASER SLUDGE

POTENTIAL HAZARDS

Guide 55

HEALTH HAZARDS

Poison.

May be fatal if inhaled, swallowed or absorbed through skin.

Contact may cause burns to skin and eyes.

Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but do not ignite readily.

Cylinder may explode in heat of fire.

EMERGENCY ACTION

Keep unnecessary people away.

Stay upwind; keep out of low areas.

Isolate hazard area and deny entry.

Wear positive pressure breathing apparatus and special protective clothing.

FOR EMERGENCY ASSISTANCE CALL CHEMTREC (800) 424-9300.

Also, in case of water pollution, call local authorities.

FIRE

Small Fires: Dry chemical, CO2, water spray or foam.

Large Fires: Water spray, fog or foam.

Move container from fire area if you can do it without risk.

Fight fire from maximum distance.

SPILL OR LEAK

Do not touch spilled material.

Stop leak if you can do it without risk.

Use water spray to reduce vapors.

Small Spills: Take up with sand, or other noncombustible absorbent material, then flush area with water.

Small Dry Spills: Shovel into dry containers and cover; move containers; then flush area with water.

Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.

If not breathing, give artificial respiration.

If breathing is difficult, give oxygen.

In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.

Speed in removing material from skin is of extreme importance.

Remove and isolate contaminated clothing and shoes.

Keep victim quiet and maintain normal body temperature.

Effects may be delayed, keep victim under observation.

From DOT P 5800.2

GUIDE 60

OF CAUSTIC ALKALI LIQUIDS, CAUSTIC SODA

THESE MATERIALS ARE PRESENT IN OUR HOT STRIP TANK SLUDGE

GUIDE 60

HAZARDOUS MATERIALS

HEALTH HAZARDS

Contact causes burns to skin and eyes.
If inhaled, may be harmful.
Fire may produce irritating or poisonous gases.
Runoff from fire control or dilution water may cause pollution.

FIRE OR EXPLOSION

Some of these materials may burn but do not ignite readily.
Explosive concentrations of gas may accumulate in tanks.
Some of these materials may ignite combustibles (wood, paper, oil, etc.).

EMERGENCY ACTION

Keep unnecessary people away.
Stay upwind; keep out of low areas.
Isolate hazard area and deny entry.
Wear self-contained breathing apparatus and full protective clothing.
FOR EMERGENCY ASSISTANCE CALL CHEMTREC (800) 424-9300.
Also, in case of water pollution, call local authorities.

FIRE

Some of these materials may react violently with water.
Small Fires: Dry chemical, CO2, water spray or foam.
Large Fires: Water spray, fog or foam.
Move container from fire area if you can do it without risk.
Cool containers that are exposed to flames with water from the side until well after fire is out.

SPILL OR LEAK

Do not touch spilled material.
Stop leak if you can do it without risk.
Small Spills: Take up with sand, or other noncombustible absorbent material, then flush area with water.
Small Dry Spills: Shovel into dry containers and cover; move containers; then flush area with water.
Large Spills: Dike far ahead of spill for later disposal.

FIRST AID

Move victim to fresh air; call emergency medical care.
Remove and isolate contaminated clothing and shoes.
In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes.
Keep victim quiet and maintain normal body temperature.

FROM: DOT P 5800.2

D. Correction Action



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

MEMORANDUM

DATE:
SUBJECT: Determination of Need for an Investigation
Facility Name: Acme Finishing Co.
EPA ID #: ILD 005 087 812

FROM: Kathleen Miller
Kathleen Miller, Environmental Protection Specialist

TO: George Hamper, Chief, Corrective Action Section 2

I recommend the following determination regarding the need for an investigation:

☒ CA070NO Determination of Need for an Investigation-Investigation is not Necessary

Reason for Determination

- ☐ Preliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further investigation
- ☐ PA/VSI recommendations do not warrant RRB attention
- ☐ Phase 1 Environmental Site Assessment (ESA) did not recommend further investigation
- ☐ Phase 2 ESA did not recommend further investigation
- ☐ Phase 1/Phase 2 ESA recommendations do not warrant RRB attention
- ☐ Company representative asserts that the site is clean
- ☐ Not subject to corrective action
- ☐ Enrolled in other clean-up program
- ☒ PA/VSI recommendations have been implemented
- ☐ Superfund Removal
- ☐ Participating in Voluntary Remediation Program
- ☐ Completed Voluntary Remediation Program
- ☐ Superfund Remedial Action
- ☐ Superfund No Further Action Decision
- ☐ Superfund Base Relocation and Closure
- ☐ Other _____

☐ CA070YE Determination of Need for an Investigation – Investigation is Necessary

Reason for Determination

- ☐ PA/VSI recommends further investigation
- ☐ ESA recommends further investigation
- ☐ Other _____

☐ No determination can be made – More Information Needed

☒ Approved

☐ Not Approved

Signed: George Hamper Date: 9/24/10

MEMO

To: File
From: Kathleen Miller
Date: 9/16/10
RE: Acme Finishing Co. (EPA ID# ILD 005 087 812)

Summary of Phone Conversation:

On September 16th, I called Dennis Walters, the contact person per RCRA Info and left a message. Later that morning, Mr. Walters returned my call and informed me that the outdoor drum storage area (SWMU 1) was removed in 1998 and a new drum storage area was constructed inside the building. He said that soil sampling was done in this area after the removal to detect any contamination. Mr. Walters was not sure if he could track down this documentation before I leave on 9/24/10 (docs are in storage). But he did say he had readily available, the No Further Remediation (NFR) letter from the state regarding the clean-up of a leaking UST. Part of the clean-up was to remove the USTs.

I received two separate emails from Mr. Walters in the afternoon of 9/16. He sent me a Phase I and Phase II ESA from 1998 regarding the outdoor drum storage area and the UST. The findings did not recommend further investigation. Mr. Walters also sent me a 2007 NFR letter from the state regarding corrective action.

I was informed by George Hamper, that if a company representative states that a Phase I/Phase II ESA report does not recommend further investigation (in this case, **Mr. Walters provided P1/P2 ESAs and overall, they do not recommend further investigation AND he provided a NFR letter from IEPA**) this is a reason to determine a CA070NO- no further investigation is necessary.

Updated contact info for this facility:

Acme Finishing Co., Inc.
1595 Oakton
Elk Grove Village, IL 60007

Dennis Walters, President
Tel: 847-640-7890
dennis@acmefinishing.com

June 22, 1998

Mr. Dennis Walters
President
ACME Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: Phase I Environmental Property Assessment

Location: 1595 Oakton Street
Elk Grove Village, Illinois

Project #: 2092-0598

Dear Mr. Walters:

Enclosed are the original and a photocopy of the Phase I Environmental Property Assessment conducted on the above referenced location. This report details the findings and conclusions of our evaluation.

EPS Environmental Services, Inc. appreciates the opportunity to have provided our services and looks forward to serving your future needs. Should you have questions concerning this report, or have further need of our services, please do not hesitate to call.

Sincerely,

Peter N. Partipilo, C.H.M.M.
Senior Environmental Specialist

PNP/ks
enclosures

PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT

1595 Oakton Street
Elk Grove Village, Illinois

Prepared For:

Mr. Dennis Walters
President
ACME Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Prepared By:

EPS Environmental Services, Inc.
7237 West Devon Avenue
Chicago, Illinois 60631

Peter N. Partipilo, C.H.M.M.
Senior Environmental Specialist

Project Number:

2092-0598

June 22, 1998

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FIGURES

Figure 1 - Property Location Map

Figure 2 - Property Sketch

APPENDICES

Appendix A - Photographic Documentation

Appendix B - Information Supplied by Client

Appendix C - Environmental Database Information

Appendix D - Historical Information

Appendix E - Environmental Questionnaire

Appendix F - EPS Environmental Qualifications

Appendix G - Proposal between Client and EPS Environmental

1.0 SUMMARY

EPS Environmental Services, Inc. (EPS Environmental) has performed a Phase I Environmental Property Assessment (Phase I Assessment) in conformance with the scope and limitations of ASTM Practice E 1527-97 of 1595 Oakton Street, Elk Grove Village, Illinois (Property). Any exceptions to, or deletions from, this practice are described in Section 2.3 of this report (Report). This Phase I Assessment has revealed no evidence of recognized environmental conditions in connection with the Property except for the following:

- There is a potential for the Property's subsurface media to have been negatively impacted from historical and/or current coating operations.
- The Property was identified on the following Federal and State environmental databases:
United States Environmental Protection Agency's (USEPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS);
Illinois Environmental Protection Agency's (IEPA) Leaking Underground Storage Tank (LUST) Incident;
USEPA Resource Conservation and Recovery Act Information System (RCRIS) generator facilities; and
Office of the State Fire Marshal's Site Facility List for Registered Underground Storage Tanks (USTs).
- Friable and non-friable suspect asbestos-containing materials were noted in the building.
- The painted surfaces of the building may contain lead above regulatory limits.
- It is possible that the ballasts within the fluorescent light fixtures in the Property building contain polychlorinated biphenyls (PCBs).
- Air-conditioning units, which may contain freon, are located on the roof-top of the building.

2.0 INTRODUCTION

EPS Environmental was retained to conduct the Phase I Assessment of the Property by Mr. Dennis Walters, President of ACME Finishing Company, Inc. (Client).

2.1 Purpose

The purpose of the Phase I Assessment was to identify readily apparent, potential sources of environmental liabilities associated with the Property.

2.2 Scope of Services

The scope of services performed by EPS Environmental was set forth in the Proposal between the Client and EPS Environmental, dated May 27, 1998, a copy of which is attached hereto, and made a part hereof, as Appendix G.

2.3 Limiting Conditions

Access to the roof-top of the building was not provided or readily available. Therefore, EPS Environmental makes no guarantees as to equipment which may be present on the roof.

The interior of the storage trailers located on the Property were not accessible to the EPS Environmental representative. In addition, the presence of heavy machinery, stockpiled materials, and carpeting limited observations of underlying interior surfaces. The presence of parked automobiles, storage trailers and dumpsters limited observations of underlying exterior surfaces. Therefore, EPS Environmental makes no guarantees as to the condition of the contents of the trailers and underlying surfaces not observed.

Any other limiting conditions pertaining to this Phase I Assessment are described in associated sections of this Report.

3.0 PROPERTY DESCRIPTION

3.1 Location and Legal Description

The Property is located on the south side of Oakton Street, approximately two and one-half miles northwest of O'Hare International Airport in Elk Grove Village, Illinois. The Property is situated in a commercial and light industrial setting. (See Figure 1 - Property Location Map, following the text of this Report.) The legal description for the Property, provided by the Client, is as follows:

LOT 160 IN HIGGINS INDUSTRIAL PARK UNIT 112, BEING A SUBDIVISION IN THE
NORTHEAST QUARTER OF SECTION 27, TOWNSHIP 41 NORTH, RANGE 11, EAST OF
THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS

3.2 Description of Improvements On-Site

3.2.1 Property Size

The Property encompasses approximately four and one-half acres.

3.2.2 Structure

A one-story, 59,337 square foot building with loading docks is located on the southeast portion of the Property.

3.2.2.1 General Construction

The approximately 22 year-old building is constructed of masonry, concrete and steel on a concrete slab foundation. A mezzanine office was recently constructed above the manufacturing area.

3.2.2.2 Interior Finishes

Typically, the interiors of the office and common areas of the building consist of carpeted and/or vinyl-tiled floors, painted gypsum-board and/or wood paneled walls and drop paneled ceilings.

The interior of the manufacturing area consists of concrete floors, painted cinder-block walls and a metal deck ceiling.

3.2.2.3 Heating and Cooling Sources

The office and common areas are heated and cooled by a natural gas-fired, heating, ventilation and air-conditioning (HVAC) unit. The manufacturing area is heated by suspended natural gas-fired, forced-air units. The former heating source had been fueled by heating oil, prior to conversion to natural gas. See Sections 3.3, 4.3.3, and 7.0 for further discussion.

3.2.3 Remaining Grounds

The remaining grounds consist of landscaped areas north and east of the building, an asphalt-paved parking lot on the northeast portion of the Property, and a graded stretch of land on the west portion of the Property. Refer to Figure 2 - Property Sketch, and Appendix A - Photographic Documentation, following the text of this Report.

3.2.4 Potable Water Source

Elk Grove Village supplies drinking water, via the City of Chicago, from Lake Michigan to the Property. The water is collected and treated by the City of Chicago Municipal Water Treatment Plant. According to the Water Department, the water is tested periodically for contaminants, and is in compliance with all EPA drinking water regulations, unless a local drinking water advisory has been issued.

3.2.5 Wastewater/Stormwater Discharge

Wastewater and stormwater run-off within Elk Grove Village are discharged into separate sewer systems. The wastewater effluent is collected and treated by the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC). The stormwater run-off is collected by on-site sewers and discharged into local waterways. Industrial process wastewater was reported being discharged and identified during the time of the on-site inspection. According to Mr. Walters, the wastewater discharge is from caustic rinse tanks and is in compliance with MWRDGC guidelines.

3.3 Information Supplied by Client

A Project Status Report (Status Report), conducted by Environmental Technologies Corporation, dated May 1998, was provided for EPS Environmental review. The Status Report documented the removal of three underground storage tanks (USTs); one, 20,000-gallon heating oil; one, 1,000-gallon xylene; and one, 1,000-gallon 150 solvent. In addition, the Status Report documented soil remedial actions. The laboratory results for the heating oil contaminated soil achieved Illinois Environmental Protection Agency's (IEPA) Tiered Approach to Corrective Action Objectives (TACO), Tier 1 soil remediation objectives (SROs) for commercial/industrial land use for Class I groundwater. However, the laboratory results for soil impacted by 150 solvent were above Tier I SRO for Class I groundwater. Further evaluation of the impacted soil was conducted, and the results of the evaluation were below Tier II SROs. It is anticipated the IEPA will grant "No Further Remediation" status for the release. See Appendix B for copy of Status Report.

3.4 Current and Past Uses of the Property

3.4.1 Current Uses

The Property is currently occupied by ACME Finishing Corporation, Inc. (ACME). ACME performs custom coating operations for industrial applications. Metal parts are cleaned in a water-based solution or by vapor degreasing which uses trichloroethane (TCA). Once cleaned, small metal items are placed on an automatic assembly line, and coated with powder and/or water-based paints. Larger metal items are individually coated by personnel in spray/powder booths, and/or in a

dip tank. The finished items are packaged and shipped to customers. The process generates hazardous waste in the form of spent TCA, tank bottoms (caustic tank sludge), spent solvents, spent paint booth filters, and excess paints.

3.4.2 Past Uses

The Property has been occupied by ACME since 1976, when ACME constructed the current building.

Prior to ACME, the Property was utilized for agricultural purposes.

See Section 4.3 - for information on the historical use review regarding the Property.

3.5 Current and Past Uses of Adjoining Sites

3.5.1 Current Uses

The Property is surrounded as follows:

North	Oakton Street Best Western Hotel/Regent Officer Center
East	Motel 6 Office Max - 300 Busse Highway
South	Cooper Lights Division, manufacturer of lighting - 400 Busse Highway
West	Metal Impact Corporation, metal works facility - 1501 Oakton Street Higgins Road

3.5.2 Past Uses

The surrounding sites had been utilized for agricultural purposes prior to the commercial and light industrial development of the area in the mid-1970s.

4.0 RECORDS REVIEW

4.1 Physical Setting Sources

The following sources were reviewed to provide information on the topographic and geologic characteristics of the Property and surrounding area. Additionally, a county radon study was reviewed to provide statistics on the Property's potential radon risk.

4.1.1 U.S. Geological Survey 7.5 Minute Series Topographic Map

According to the Arlington Heights Quadrangle map, the general topography of the area displays an approximate 20 foot decrease in elevation within ½- mile southeast of the Property.

4.1.2 Illinois State Geological Survey Circular #460, "Surficial Geology of the Chicago Region"

The Property is located on the Tinley Ground Moraine of the Wadsworth Member of the Wedron Formation. This Pleistocene Age system consists of mostly gray clay and silty clay till, relatively low in content of pebbles, cobbles, and boulders; contains local lenses of silt; commonly mantled with one to two feet of loess and soil.

4.1.3 Illinois State Geological Survey Circular #532, "Potential for Contamination of Shallow Aquifers from Land Burial of Municipal Waste"

The Property is located within the rating area of E. The rating denotes the capacities of earth material to accept, transmit, restrict or remove contaminants from waste effluent. In general, an E rating area contains uniform, relatively impermeable silty or clayey till at least 50 feet thick with no evidence of interbedded sand and gravel.

4.1.4 Illinois Department of Nuclear Safety, "Radon In Illinois: A Status Report" Update December 1990

The Property is located in Cook County in which 17% of homes tested had radon levels greater than 4.0 picocuries per liter (pCi/L). The level of 4.0 pCi/L is the standard set by the USEPA. An average level of 2.8 pCi/L was detected among the 261 homes screened. This screening data is included as a guide to background conditions, and should not be construed as site-specific data. It should be noted, radon is of lesser concern for buildings constructed on concrete slab foundations, as is the case of the Property.

4.2 Federal and State Environmental Record Sources

The following federal and state databases were reviewed for recorded environmental concerns on the Property and known sites within the Approximate Minimum Search Distance, as designated in ASTM Standard E 1527-97. Refer to Appendix C - Environmental Database Information, for the listings of sites identified within the study area and database descriptions.

- United States Environmental Protection Agency (USEPA) National Priority List (NPL), March 1998 - 1-mile search distance
- USEPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), March 1998 - 1/2-mile search distance
- USEPA Resource Conservation and Recovery Act Information System (RCRIS) Treatment, Storage and Disposal (TSD) facilities, March 1998 - 1-mile search distance
- USEPA Resource Conservation and Recovery Act Information System (RCRIS) Generator and Transporter facilities, March 1998 - Property and adjacent sites
- USEPA Emergency Response Notification System (ERNS), 1987 - May 1998 - Property only
- Northeastern Illinois Planning Commission (NIPC) Database, December 1987 - 1/2-mile search distance
- Illinois Environmental Protection Agency's (IEPA's) List of Solid Waste Disposal Sites, various dates - 1/2-mile search distance
- USEPA Category List^a (State Equivalent to NPL and CERCLIS), June 1997 - 1-mile search distance
- IEPA Leaking Underground Storage Tank (LUST) Incident Report, January 1998 - 1/2-mile search distance
- Office of the State Fire Marshal (OSFM) Registered Underground Storage Tanks (USTs), March 1998 - Property and adjacent sites

The Property was identified on the CERCLIS, LUST, UST, and RCRA databases reviewed. The USEPA and the IEPA were contacted via Freedom of Information Act (FOIA) requests for additional information regarding the Property database listings.

^a The IEPA publishes a Category List of sites identified for investigation or remediation, which is the State equivalent to NPL and CERCLIS. The Category List is to be reviewed for the Property and sites within a 1-mile radius. However, listings in publicly available records which do not have adequate address information to be located geographically, such as the Category List, are not generally considered practically reviewable. Therefore, this list was reviewed for the Property and recognizable facility names of surrounding sites.

According to the CERCLIS information received, the Property was inspected by the USEPA in 1991 for possible hazardous waste release(s). The results of the inspection indicated a "low potential" for human exposure from release(s) of hazardous waste from five solid waste management units (SWMUs). SWMUs are areas of a facility where hazardous waste is stored, and/or an area where hazardous waste is generated from (i.e., hazardous waste treatment equipment, or other areas where hazardous waste is generated from). The IEPA inspection identified soil staining in the hazardous waste outside storage area, and poor containment from the open-top vapor degreaser which used trichloroethane (TCA). Although soil testing was recommended by the IEPA, no soil testing was conducted based on the low potential for human exposure. See Sections 6.5 and 7.0 for further discussion.

According to the Status Report provided by the Client (Appendix B), two separate LUST incidents were reported in 1991 and 1992 during removal of two solvent USTs, and one 20,000-gallon heating oil UST, respectively. The petroleum impacted soil associated with the removed heating oil UST was treated in-situ (in-ground) by bioremediation. After five years of biotreatment, the concentrations of contaminants of concern (COCs) associated with heating oil were below IEPA's TACO Tier I soil remediation objectives (SROs) for commercial/industrial land use and Class I groundwater remediation objectives (GROs). The soil impacted by xylene and 150 solvent was treated using a passive venting technique (off-gas through passive air venting). The results of 5 years of passive venting have reduced the concentrations of COCs to Tier II levels which the IEPA may allow to remain in-ground. See Sections 4.3.3, 6.1 and 7.0 for further discussion.

According to the OSFM Registered UST database, the Property is listed as having "0" closed USTs. See Sections 4.3.3 and 6.1 for further discussion.

According to the RCRA information, ACME applied for a RCRA permit for treatment, storage and disposal facility (TSDF). In 1991, ACME applied to the USEPA to change the status from the TSDF to a large quantity generator of hazardous waste. During formal RCRA closure, the USEPA cited ACME for various regulatory compliance deficiencies (i.e., lack of posted signs, poor containment, and lack of an emergency response plan) relating to the storage of hazardous waste. A "Consent Agreement" and "Final Order" to correct the deficiencies was entered as judgment. The formal RCRA closure was achieved and ACME was granted the RCRA status change to large quantity generator of hazardous waste. See Section 6.5 for further discussion.

See Appendix C for excerpts for USEPA and IEPA documents.

Further review of the databases identified one additional RCRA facility, 13 additional LUST sites, an additional CERCLIS site and six Category List sites within the search distances.

The south adjacent site, 400 Busse Highway, was identified on the RCRA generator database as a large quantity generator of hazardous waste. No evidence of outside storage areas were observed on this site during the site reconnaissance. This site did not appear on any of the state or federal databases as having a recorded release. Assuming the hazardous waste is properly handled, stored and disposed, this site should not present an environmental concern to the Property.

None of the remaining 13 recorded LUST sites were identified within 1/8-mile of the Property. Based on the physical distances from the Property and the dense urban infrastructure and low permeability soil types in the area, these 13 recorded LUST sites should not present an environmental concern to the Property.

One CERCLIS site was identified approximately 1/2-mile southwest of the Property. Based on the physical distance from the Property and the dense urban infrastructure in the area this CERCLIS site identified within the 1/2-mile study radius is not expected to present an environmental concern to the Property.

Two Category List sites, 330 Bond Street and Deluxe Check Printer at 1640 Jarvis Street, are located over 1/2-mile from the Property. As addresses were not provided or available for the remaining four identified Category List sites, De West Shopping, J&A Metal, Air Cargo, and Honeywell, the exact distances from the Property could not be determined. However, the facility names were not identified on the Property or on any of the surrounding sites. Therefore, based on the known and assumed physical distances from the Property and the dense urban infrastructure and soil types in the area, the six Category List sites should not present an environmental concern to the Property.

4.3 Historical Use Information

The following reasonably obtainable sources of information were reviewed or contacted to determine the historical uses of the Property. When feasible, information pertaining to the adjacent sites was reviewed.

4.3.1 Aerial Photographs (Aerials) - 1949, 1970, 1980, and 1990 provided by Chicago Aerial Photo Services, Inc. and reviewed at University of Illinois at Chicago Library

The Property appeared as utilized for agricultural purposes on the 1949 and 1970 Aerials. On the 1980 Aerial the Property was developed with the current building. On the 1990 Aerial, what appeared to be a small structure was present west of the current building, a semi trailer was north of the small structure. No evidence of significant disturbance of upper soil layers, or signs of open dumping on the Property were depicted on the Aerials reviewed.

The surrounding sites appeared as utilized for agricultural purposes on the 1949 and 1970 Aerials. On the 1980 and 1990 Aerials, the commercial and light industrial development of the surrounding sites is shown. No signs of open dumping on the surrounding sites were depicted on the Aerials reviewed.

See Appendix C - Historical Information for copies of the Aerials reviewed.

4.3.2 Historical Building Permits, via FOIA request to the Elk Grove Village Building Department

At the time of the writing of this Report, a response had not been received from the building department. In the event environmentally significant information is received, that alters the Findings and/or Conclusions of this Report, it will be promptly forwarded to the Client.

4.3.3 Fire Department Records, via FOIA request to the Elk Grove Village Fire Department

Review of Fire Department records identified documents regarding UST removals and hazardous waste storage on the Property. A Special Inspection Report, dated May 1979, documented poor containment in the outside drum storage area. Moreover, the Fire Inspector noted, "I also observed a pool of unknown substance approximately 6'x 6' in the field with a dirt dike built around it. I believe the above company (ACME) is dumping the waste." In addition, the IEPA was notified by the Elk Grove Fire Department. A Permit for Removal, dated September 1992, for two 1,000 gallon and one 20,000 gallon USTs noted the reason for removal as a "tank system release". An Underground Storage Tank Closure/Removal (Closure/Removal Document), dated November 1992, noted the previously discussed 20,000 gallon UST stored fuel oil, was located in the north parking lot and was in "OK" condition. An additional Closure/Removal Document, dated July 15, 1992, noted the two previously noted 1,000 gallon USTs as located under the floor of the warehouse, in good condition and one containing Xylene and the other containing 150 Solvent. See Appendix D for copies of documents.

4.3.4 Zoning, via telephone interview with Elk Grove Village Zoning Department

According to a representative of the Department, the Property is zoned I-1, restricted industrial district.

5.0 INTERVIEWS

The following individuals were interviewed and/or supplied an environmental questionnaire for specialized knowledge concerning the Property. The relevant information provided by these individuals has been incorporated in the appropriate sections of this Report.

Mr. Dennis Walters - President of ACME - Accompanied, and interviewed by, EPS Environmental representative during on-site inspection and completed an environmental questionnaire (Appendix E)

Local Officials

6.0 SITE RECONNAISSANCE

The site reconnaissance was conducted on June 12, 1998, at approximately 1:00 p.m., by Mr. Peter N. Partipilo, Senior Environmental Specialist for EPS Environmental (Appendix F). The site reconnaissance was initiated by observing the Property and adjacent sites from public thoroughfares and walking the Property boundaries. The building inspection commenced in the reception area, continued through the manufacturing area and concluded in the office area. Photographic documentation of significant environmental features has been included as Appendix A.

The weather conditions were mostly sunny, with temperatures in the middle 70s, and winds of approximately eight miles per hour from the southwest. Surface conditions were relatively dry with isolated areas of standing water in the recently graded west portion of the Property.

6.1 Underground Storage Tanks (USTs)

Two vent pipes and one fill pipe were observed along the east exterior wall of the building. This equipment is likely associated with the former 150 solvent and xylene USTs. One groundwater monitoring well was observed in the parking lot on the adjacent site, approximately 5 feet east of the Property border. Moreover, Mr. Walters identified a patched area of concrete in the northeast portion of the manufacturing area as the former location of the xylene and 150 solvent USTs.

According to Mr. Walters, an in-service 5,000 gallon secondary containment UST (e.g., used to contain contaminated water in the event of a fire within the paint vault) is located along the east Property border, approximately 40 feet north of the building. In 1992, approximately 2,200 gallons of water was pumped from the containment UST. The presence of the water is believed to have resulted from an accumulation of 16 years of condensed water, and not a result of groundwater infiltration. Neither tank tightness testing nor soil testing was conducted around the containment UST.

No additional equipment typically associated with USTs was observed.

6.2 Aboveground Storage Tanks (ASTs)/Storage Drums/Containers

No ASTs were observed on the Property during the on-site inspection.

Numerous 55-gallon storage drums containing new and excess paints, new and spent solvents, degreasing sludge, rinsate tank bottoms, and washing solution chemicals were identified in several areas throughout the manufacturing area. All of the storage drums were located on a thick concrete surface with signs of insignificant to moderate staining evident around several of the drums. No significant cracks in the concrete surface below the storage drums were noted. In addition, according to Mr. Walters several storage drums are present in the storage trailers located in the parking lot area. No signs of leakage or spillage were observed on, or beneath the storage trailers. It should be noted, several storage drums containing hazardous waste were not properly labeled or mislabeled.

Several one- and five-gallon containers of petroleum products and other lubricants were present within the manufacturing area.

6.3 Stained Surfaces/Stressed Vegetation

The concrete surface located within the manufacturing area exhibited signs of surficial floor staining. A majority of the concrete floor appeared to be generally sound and intact. However, several isolated areas of cracked concrete were observed. The general housekeeping practices of ACME appear to be satisfactory.

As previously mentioned, a hazardous waste storage area was formerly located in the western portion of the Property, which has been recently graded for building expansion. No unusual odors or signs of soil staining were noted in location of the former outside hazardous waste storage area. No stressed vegetation was observed on landscaped areas of the Property.

6.4 Stormwater Run-off/Standing Water

Stormwater run-off from the Property appeared to flow to the south. A storm sewer catch basin was noted in the parking lot, and storm sewers were noted in Oakton Avenue. No sheens were noted in the sewers. Isolated areas of standing water were observed on the recently graded west portion of the Property. No unusual odors or sheens were noted on the surface of the standing water.

6.5 Waste Disposal Practices

According to Mr. Walters, the aforementioned hazardous waste generated from ACME operations is collected for off-site recycling/disposal by various licensed hazardous waste vendors. The solid waste and general trash is collected for off-site disposal by Waste Management. No other forms of hazardous waste or special waste is generated from ACME operations. There were no signs of mishandling or illegal dumping of hazardous waste on the Property.

6.6 Polychlorinated Biphenyls (PCBs)

Two air compressors were present in the manufacturing area. No signs of leakage or staining were noted around this equipment, based on the estimated age of this equipment, it is unlikely the crankcase fluids contain PCBs.

Fluorescent light fixtures were observed throughout the building. No signs of leakage were observed on the light fixtures. Based on the construction date of the building, it is possible the ballasts within the fluorescent light fixtures contain PCBs.

Three slab-mounted transformers was noted east of the building in a grassy area near the Property boundary. The equipment was not observed to be leaking or to be labeled with a black and yellow PCBs warning sticker. A warning sticker is required by federal regulations for equipment containing between 50 and 500 ppm PCBs or greater. ComEd, as the owner of the transformers, is responsible for keeping the equipment in compliance with federal, state and local regulations, and the cleanup of contamination resulting from leaking equipment, as necessary.

6.7 Air Quality/Emissions

Slight solvent odors, common to coating facilities, were noticed in the building. No unusual odors were noticed emanating from the Property itself.

Point source air emissions from paint booths, dip tank, vapor degreaser, and the building's heating sources were identified on the Property. No other sources typically associated with point source air emissions were identified. According to Mr. Walters, ACME maintains air permits with the IEPA for all point source air emissions, and is in compliance with emission standards.

6.8 Suspect Asbestos-Containing Material (ACM)

ACM has been used extensively in the construction of buildings. According to the USEPA, ACM is commonly found in three forms: (1) sprayed or troweled-on ceilings and walls (surfacing materials), including structural fireproofing; (2) in insulation on pipes, ducts, boilers, tanks or mechanical equipment [thermal system insulation (TSI)]; and (3) in "miscellaneous materials," such as, floor tiles, roofing felts and shingles, or wall boards. ACM is of greatest potential concern when it is friable, particularly if it is damaged or deteriorated. Friable, by definition, refers to a material

that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Friable ACM is more likely than non-friable ACM to release fibers when disturbed or damaged. Airborne asbestos fibers can pose a potential respiratory health risk to building occupants who are exposed.

Mr. Peter N, Partipilo, an Illinois Department of Public Health (IDPH) licensed Asbestos Inspector (No. 100-3871), performed an visual inspection within the Property building for suspect asbestos-containing material (ACM). The following chart summarizes suspect ACM to include, but are not limited to:

HOMOGENEOUS MATERIAL	LOCATION	CONDITION	FRIABLE	NON-FRIABLE
Wall Board System	Office Area	Good		X
2'x2' and 2'x4' Ceiling Panels	Office Area	Good	X	
12" x 12" Floor Tile	Office and Common Areas	Good		X
Roofing Materials	Roof	Not Observed		X

6.9 Potential Lead-based Paint

Painted surfaces were observed throughout the building appeared to be in overall good condition. Due to the age of the building, the paint may contain lead above regulatory limits.

6.10 Miscellaneous Equipment

One vapor degreasing tank was present in the manufacturing area. According to Mr. Walters, the degreasing tank (tank) contains trichloroethane (TCA). Accumulated sludge from the tank is drummed and transferred off-site as hazardous waste for recycling on an as-needed basis. Slight staining was observed on the concrete surface beneath the tank. The concrete surface adjacent to the tank was deteriorated with evidence of significant pitting.

Water rinsate tanks using a caustic solution were present in the manufacturing area. During cleaning the accumulated sludge is collected and transported off-site for treatment and disposal. Process wastewater is treated and batch discharged into the sanitary sewer system. No unusual odors or signs of deteriorated concrete were noted surrounding the tank.

Air-conditioning units are located on the roof-top of the building. The air-conditioning units may contain freon gas. Freon is a federally regulated substance that is known to contribute to ozone depletion within the atmosphere.

6.11 Observations of Surrounding Sites

Visually recognizable environmental concerns were not identified on the adjacent sites, as observed from the Property and public right-of-ways.

7.0 FINDINGS AND CONCLUSIONS

EPS Environmental Services, Inc. has performed a Phase I Environmental Property Assessment in conformance with the scope and limitations of ASTM Standard Practice E 1527-97, for the Property. Any exceptions to, or deletions from this practice are described in Section 2.3 of this Report. This Phase I Assessment has revealed no evidence of recognized environmental conditions in connection with the Property except for the following:

Uses of the Property

The Property has been occupied since development (1976) by ACME Finishing Company, Inc. (ACME). Prior to ACME, the Property was used for agricultural production. ACME provides custom paint-finishing operations for manufacturers of diversified metal products. Starting materials consist of prefabricated steel and aluminum metal parts. Paint coatings are applied to these parts and baked for curing. Coating materials include high- and low-solid solvent-based paints; water based-paints; and dry powder.

ACME generates hazardous waste in the form of spent trichloroethane (TCA), rinsate tank bottoms, paint thinners (xylene, naphtha, and formerly toluene), and excess paints. The hazardous waste appears to be properly handled and there were no signs of mishandling or illegal dumping of hazardous waste on the Property.

Slight staining and deteriorated concrete surfaces were noted in the manufacturing area where various hazardous materials are stored and/or used. The concrete surfaces in the areas of staining appear to be generally sound and intact, with the exception of several isolated areas of moderate cracking. As the underlying concrete surface acts, to a certain degree, as a protective barrier, inhibiting the potential for contaminating underlying soils, the probability for contaminating the underlying soils is, most likely, minimal. However, to determine whether the Property's environmental media has been negatively impacted in the area of the vapor degreaser, limited subsurface investigation would be necessary.

The Property was identified on the CERCLIS and LUST databases

According to information supplied by the USEPA, regarding the CERCLIS listing, the Property was inspected by the USEPA in 1991 for possible hazardous waste release(s). The results of the inspection indicated a "low potential" for human exposure from release(s) of hazardous waste from five solid waste management units (SWMUs). SWMUs are areas where hazardous waste is stored, and/or an area where hazardous waste is generated (i.e., hazardous waste treatment equipment). The USEPA inspection identified soil staining in the hazardous waste outside storage area and poor containment from the open-top degreaser which used trichloroethane (TCA). The USEPA recommended soil testing; however, it was not conducted based on the low potential for human exposure. To determine whether hazardous substances have impacted the Property soil, a limited subsurface investigation would be necessary in the area of the two identified SWMUs (former outside storage area and adjacent to the open-top degreaser).

The LUST incidents were recorded in 1991 and 1992 during removal of two solvent USTs and one 20,000-gallon heating oil UST, respectively. The petroleum-impacted soil associated with the removed heating oil UST was treated by bioremediation in-situ (treated in-ground). After five years of biotreatment, the concentrations of contaminants of concern (COCs) associated with heating oil contaminated soil are below IEPA's TACO Tier I soil remediation objectives (SROs) for commercial/industrial land use and Class I groundwater remediation objectives (GROs). The soil impacted by toluene and 150 solvent were treated using a passive venting technique (off-gas through passive air venting). The results of five years of passive venting have reduced the concentrations of COCs to Tier II levels for Class II groundwater, which the IEPA may allow to remain in-ground. Based on review of published geological and hydrogeological information, and on-site and off-site boring information, it is the opinion of this firm that the IEPA would allow a Class II groundwater designation for the Property. With the exception of additional testing the IEPA may require to demonstrate Class II groundwater underlies the Property, no further testing is recommended for the LUST incident on the Property.

It should be noted, TACO guidelines require Property owners/operators employing an engineering barrier to; 1) maintain a scaled map delineating the horizontal extent of contamination above Tier 1 SROs; 2) provide written procedures for maintenance of the barrier; 3) develop a construction work plan for subgrade work (e.g., utility installation/repair), including a written worker protection plan (made available to outside contractors); 4) insure the proper disposal of all contaminated media into a facility licensed to accept such waste, according to applicable laws and regulations, if contaminated soil is excavated; and 5) file a Preventative Institutional Control (Environmental Notice)

prohibiting the use of potable groundwater beneath the Property with the Cook County Recorder of Deeds.

Suspect Asbestos Containing Material

Suspect friable and non-friable asbestos containing material (ACM) was previously noted in Section 6.8 of this Report. Assuming that the suspect material is ACM and remains in good condition, it may be maintained in-place following an Operations and Maintenance (O&M) program. If future plans call for removal of the suspect ACM, or the materials become significantly damaged, sampling and analysis of these materials are recommended. Moreover, should laboratory analysis determine that the materials contain asbestos, they should be professionally removed and disposed by a licensed asbestos contractor in compliance with applicable federal, state and local regulations.

Potential Polychlorinated Biphenyls (PCBs) Containing Equipment

Potential PCBs containing fluids may exist in the ballasts of the fluorescent light fixtures noted inside the building. No signs of leakage were observed on the fixtures. Should future plans involve the repair, removal or disposal of the fixtures, proper procedures and precautions should be followed regarding the ballasts.

Equipment Containing Regulated Substances

In the event that the air-conditioning units are repaired or removed from the premise, the freon, if present, should be recovered.

8.0 WARRANTY AND LIMITATIONS OF LIABILITY

The Phase I Assessment and this Report are of limited scope, and do not provide sufficient information to eliminate the total risk of the presence of contamination or other liabilities. Significantly higher levels of exploratory efforts than those performed in this Phase I Assessment are required to accumulate sufficient information to determine all environmental liabilities associated with the Property. Subsurface investigations and testing were beyond the scope of this Phase I Assessment.

EPS Environmental warrants that the Phase I Assessment has been conducted in accordance with generally accepted investigatory methods utilized by professional environmental consultants and includes the recommended practices for the "Phase I Environmental Site Assessment Process" contained in the ASTM Standard E 1527-97. EPS Environmental further warrants that the findings and conclusions in this Report are based exclusively on the Phase I Assessment. The investigatory

methods that EPS Environmental utilized in the Phase I Assessment have been developed to provide the Client with information regarding apparent indications of existing or potential environmental conditions relating to the Property and are limited to the conditions that were observed at the time of the investigation of the Property. The findings and conclusions contained in this Report are also limited to the information available on the Property at the time that the Phase I Assessment was conducted. There is a distinct possibility that conditions may exist at the Property which were not apparent during the preparation of the Phase I Assessment. In conducting the Phase I Assessment and preparing the Report, EPS Environmental relied on the information obtained from Property owner/operators or other persons, and government agencies having knowledge of operations and practices of the Property. EPS Environmental has assumed that this information is accurate and complete, except when independent investigation has indicated otherwise.

The Phase I Assessment did not attempt to determine whether the facilities operating on the Property are in compliance with existing environmental regulations. This Report discusses and summarizes areas of potential environmental concern for the Property itself. This Report provides no other warranties, expressed or implied.

8.1 Confidentiality

EPS Environmental will hold the Report and all field observations and related documents in strict confidence and will not disclose these items except to the Client and American National Bank and Trust Company of Chicago or except as ordered by any state or federal agency or court of law. In the event that EPS Environmental is ordered by a state or federal agency or court of law to disclose the contents of the Report or field observations, the Client and American National Bank and Trust Company of Chicago shall hold EPS Environmental harmless from liability for any damages that the Client and American National Bank and Trust Company of Chicago may suffer due to EPS Environmental's disclosure. In addition, the Client and American National Bank and Trust Company of Chicago shall indemnify EPS Environmental from any and all damages EPS Environmental may suffer due to any action which results in an order that EPS Environmental make a disclosure.

8.2 Reliance On Phase I Assessment And Report

The Phase I Assessment has been conducted, and this Report has been prepared, exclusively for the Client and American National Bank and Trust Company of Chicago and it is intended that only the Client and American National Bank and Trust Company of Chicago will rely on the Phase I Assessment and Report. The Phase I Assessment and Report will be solely for the benefit of the Client and American National Bank and Trust Company of Chicago, and may not be relied upon by other parties.

8.3 Sources of Information Relied Upon For Phase I Assessment and Report

All information that EPS Environmental has relied on in conducting the Phase I Assessment and preparing the Report, not specifically identified as generated by EPS Environmental or any federal, state, or local agency, has been supplied by or derived from data provided by the Client.

8.4 Certification

The undersigned hereby affirms that:

The reported analyses, opinions and conclusions are personal, unbiased, professional and limited only by the assumptions and qualifications stated herein. Compensation is not contingent upon an action or an event resulting from the analyses opinions, or conclusions in, or the use of, this Report.

This Phase I Assessment has been performed in accordance with all applicable legal requirements and in accordance with accepted practices prevailing in the environmental industries. The personnel who performed the Phase I Assessment are properly licensed and certified in accordance with the requirements of all federal, state and local laws, rules and regulations.

We have no present or prospective interest in the Property or the parties involved.

The Report has been prepared in conformance with the Bank's requirements for Phase I Environmental Site Assessments

Peter N. Partipilo, C.H.M.M.
Senior Environmental Specialist

FIGURES

APPENDIX A
PHOTOGRAPHIC DOCUMENTATION

APPENDIX B
INFORMATION SUPPLIED BY CLIENT

APPENDIX C
ENVIRONMENTAL DATABASE INFORMATION

APPENDIX D
HISTORICAL INFORMATION

APPENDIX E
ENVIRONMENTAL QUESTIONNAIRE

APPENDIX F

EPS ENVIRONMENTAL QUALIFICATIONS

APPENDIX G

PROPOSAL BETWEEN CLIENT AND EPS ENVIRONMENTAL

ENVIRONMENTAL DATABASE DESCRIPTIONS

NPL -	National Priority List for sites targeted for long-term remediation action under Superfund.
CERCLIS -	Comprehensive Environmental Response, Compensation, and Liability Information System for priority cleanup sites or those sites under investigation for possible hazardous waste disposal.
RCRIS -	Resource Conservation and Recovery Act Information System for facilities that generate, store, transport, treat or disposal of hazardous waste.
ERNS -	Federal Emergency Response Notification System List of reported hazardous substance releases or spills in quantities greater than the reportable quantity, as maintained at the National Response Center.
NIPC -	Northeastern Illinois Planning Commission database for active and inactive solid waste disposal sites.
LBDS -	Illinois Environmental Protection Agency's list of active solid waste disposal sites in Illinois.
CAT -	Illinois Environmental Protection Agency's Category List, which is the State equivalent to NPL and CERCLIS, for sites identified for investigation or remediation.
LUST -	Illinois Environmental Protection Agency's Leaking Underground Storage Tank Incident Report.
USTs -	Office of the State Fire Marshal's Site Facility List for Registered Underground Storage Tanks (USTs).

July 17, 1998

Mr. Dennis Walters
Vice President
ACME Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: Phase II Limited Subsurface Investigation

Location: 1595 Oakton Street
Elk Grove Village, Illinois

Project #: 2146-0698

Dear Mr. Walters:

The following report presents the methods and results of the Phase II Limited Subsurface Investigation performed by EPS Environmental Services, Inc. (EPS Environmental) at the above referenced location. The report includes field screening observations and laboratory results of samples collected during the course of the investigation.

As always, EPS Environmental appreciates the opportunity to have been of service. Should you have any questions regarding this report or should your future needs require our services, please do not hesitate to call.

Sincerely,

Peter N. Partipilo, C.H.M.M.
Senior Environmental Specialist

PNP/nc
enclosures

PHASE II LIMITED SUBSURFACE INVESTIGATION

1595 Oakton Street
Elk Grove Village, Illinois 60007

Prepared For:

Mr. Dennis Walters
Vice President
ACME Finishing Company, Inc.
1595 Oakton Street
Elk Grove Village, Illinois 60007

Prepared By:

EPS Environmental Services, Inc.
7237 West Devon Avenue
Chicago, Illinois 60631

Nicholas J. Cuzzone, P.E.
Senior Project Engineer

Reviewed By:

Peter N. Partipilo, C.H.M.M.
Senior Environmental Specialist

Project Number:

2146-0698

July 17, 1998

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FIGURES

Figure 1 - Boring Location Map

APPENDICES

Appendix A - Geologic Boring Logs

Appendix B - Chain of Custody Record / Laboratory Analytical Data

1.0 GENERAL

This report (Report) presents the findings and conclusions of the Phase II Limited Subsurface Investigation conducted at 1595 Oakton Street, Elk Grove Village, Illinois (the Property).

1.1 Authorization

Authorization to perform the Phase II Limited Subsurface Investigation was given by acceptance of EPS Environmental Services, Inc. (EPS Environmental) proposal number 2146-0698 by Mr. Dennis Walters, Vice President of ACME Finishing Company, Inc. (Client).

1.2 Background Information

A Phase I Environmental Property Assessment (Phase I), performed by EPS Environmental, dated June 22, 1998, identified a potential risk for the Property's environmental subsurface media to have been negatively impacted by the historical and/or current coating operations performed on the Property. Of most concern were the former outside drum storage area, and a vapor degreaser that utilizes chlorinated solvents.

1.3 Purpose

The purpose of the Limited Subsurface Investigation was to obtain representative soil samples in two areas of concern (AOCs) on the Property; 1) AOC-1, the former outside drum storage area; and 2) AOC-2, opposite a vapor degreaser, to screen for the presence of hazardous substances that may have negatively impacted the Property soil.

2.0 SAMPLING PROCEDURE

Soil Investigators, Inc. of Chicago, Illinois, was employed by EPS Environmental to perform the soil borings under the direction of Mr. Nicholas J. Cuzzone, P.E., Senior Project Engineer for EPS Environmental. Soil borings were conducted on June 29, 1998. Soil borings are documented on the Boring Location Map (Figure 1) which can be found following the text of this Report.

Five soil borings were conducted on the Property to address each AOC as follows:

AOC-1/ Former outside drum storage area:

Three soil borings (B-1 through B-3) were conducted in the former outside drum storage area located in the northwest portion of the Property.

AOC-2/ Vapor degreaser:

Two soil borings (B-4 and B-5) were conducted along the west exterior wall of the Property building, opposite the location of a vapor degreaser present in the building that utilizes chlorinated solvents.

2.1 Field Activities

Soil borings were conducted following recommended practices for continuous thin wall probe sampling. A truck-mounted, hydraulically-powered percussion/probing device (Geoprobe®) was used to advance a two- inch diameter steel drive point to the top of the desired sampling interval. Soil samples were collected in 48-inch intervals by advancing two-inch diameter steel thin-wall probe samplers. The samplers were attached to the leading end of the extension probe rods, and driven downward until the desired target depths were reached. After the desired sampling interval was obtained, the assembly was extracted, opened and the samples were collected, using a stainless steel trowel.

The borings were advanced to depths of eight to 12 feet below grade (see Geologic Boring Logs, Appendix A). Two to three samples were collected from each boring. Duplicate soil samples were collected from each sampling interval. One sample was placed into an air-tight plastic bag for field screening and the second sample was placed into a glass jar, allowing no headspace, and sealed with a Teflon lined plastic lid for possible laboratory analysis.

All sampling equipment was cleaned with hot water and non-alkaline soap between each sampling event. This procedure was used to minimize the possibility of cross contamination. Sampling procedures were in accordance with ASTM recommended methods. All borings were properly sealed and abandoned with bentonite chips.

2.2 Field Observations

Soil samples were examined for visual signs of contamination and the presence of unusual odors. The samples in air-tight plastic bags were allowed to equilibrate to approximately 70° Fahrenheit for 20 minutes. The headspace in each sample bag was then screened with a RAE photo-ionization detector (PID) and the values were recorded on Geologic Boring Logs (Appendix A). It should be noted, the PID field instrument records total concentrations of organic vapors, and does not differentiate specific organic compounds.

PID headspace measurements from screened soil samples ranged from zero to 150 parts per million (ppm). No visual or olfactory evidence of solvent or paint contamination was observed in the soil samples obtained from the borings. Groundwater was not encountered.

3.0 PHYSICAL SETTING

3.1 Topography

According to the Arlington Heights Quadrangle map, the general topography of the area displays an approximate 20 foot decrease in elevation within ½- mile southeast of the Property.

3.2 Soils

According to Illinois State Geological Survey (ISGS) Circular #460, Surficial Geology of the Chicago Region, the Property is located on the Tinley Ground Moraine of the Wadsworth Member of the Wedron Formation. This Pleistocene Age system consists of mostly gray clay and silty clay till, relatively low in content of pebbles, cobbles, and boulders; contains local lenses of silt; commonly mantled with one to two feet of loess and soil.

According to ISGS Circular #532, Potential for Contamination of Shallow Aquifers from Land Burial of Municipal Waste, the Property is located within the rating area of E. The rating denotes the capacities of earth material to accept, transmit, restrict or remove contaminants from waste effluent. In general, an E rating area contains uniform, relatively impermeable silty or clayey till at least 50 feet thick with no evidence of interbedded sand and gravel.

3.3 Geologic Profile

Based on soil borings conducted, the general geologic profile of the Property consists of approximately two feet of gravel and clay fill material, underlain by brown, silty clay, to the maximum boring depth of 12 feet. The geological profile of the native soils encountered appeared to be consistent with those published by the ISGS.

4.0 LABORATORY ANALYSES

4.1 Analytical Program

Based on PID screening results, two representative soil samples (SB-2/3' and SB-3/3') from AOC-1, and one representative soil sample (SB-4/6') from AOC-2 were selected for laboratory analysis. The soil samples submitted for analysis were placed into four-ounce glass jars, allowing no head space, and sealed with Teflon-lined plastic lids. The samples were chilled and transported under chain of custody to AEA Laboratories, Inc. of Chicago, Illinois. See Appendix B for Chain of Custody Record. The representative

soil samples from AOC-1 were analyzed for volatile organic compounds (VOCs) and RCRA metals, indicator contaminants associated with solvents and paints. The representative soil sample from AOC-2 was analyzed for VOCs, indicator contaminants associated with degreasing solvents. The analyses were performed in accordance with SW-846, Test Methods for Evaluating Solid Waste using appropriate USEPA methodology.

4.2 Evaluation of Laboratory Results

To assess potential detrimental environmental impacts, the Illinois Environmental Protection Agency (IEPA) Tiered Approach to Corrective Action Objectives (TACO) Tier 1 soil remediation objective values were used as a guideline for qualifying the concerns associated with soil contamination. Soil remediation objectives (SROs) are numerical concentration goals for contaminated soil. The Tier 1 SROs are further separated into two objectives dependent on intended land use (either residential or commercial/industrial). The TACO SROs apply to sites where the IEPA has requested or forced remedial actions, or to sites where voluntary cleanups have been initiated under IEPA supervision.

To apply TACO Tier 1 SROs, three exposure routes need to be evaluated: ingestion, inhalation, and potential to contaminate groundwater. The ingestion exposure route applies to contaminant concentrations above TACO Tier 1 SROs within the first three feet below the land surface. The inhalation exposure route applies to contaminant concentrations above TACO Tier 1 SROs within the first ten feet below land surface. The potential to contaminate groundwater is further separated into two objectives dependent on Class I or Class II groundwater designation. The IEPA generally will take a more conservative approach by assuming Class I groundwater to be present, unless otherwise documented.

4.3 Analytical Results

Varying concentrations of RCRA metals (arsenic, barium, chromium and lead) were detected in the representative soil samples obtained from AOC-1 (SB-2/3' and SB-3/3'). Various VOC compounds were also detected in soil sample SB-3/3', and in soil sample SB-4/6', obtained from AOC-2.

See Appendix B for laboratory analyses and chain of custody.

5.0 CONCLUSIONS

Five soil borings were conducted on the Property to determine whether the subsurface media has been impacted in two areas of concern (AOCs); 1) AOC-1, a former outside drum storage area; and AOC-2, opposite a vapor degreaser that utilizes chlorinated solvents. Field observations at the time of the subsurface investigation revealed no visual or olfactory evidence of solvent or paint contamination

present in the representative soil samples obtained from AOC-1 or solvent contamination from AOC-2 (along the west exterior wall of the Property building, opposite the vapor degreaser). Laboratory results of the soil samples revealed no indicator contaminants associated with solvents and paints above the Illinois Environmental Protection Agency (IEPA) Tiered Approach to Corrective Action Objectives (TACO) Tier 1 soil remediation objectives (SROs) for residential properties (the most stringent SROs).

It should be noted, due to wet surface conditions encountered during field activities, which limited accessibility to drilling equipment, soil borings in AOC-2 were conducted approximately ten feet from the interior location of the vapor degreaser. Consequently, there is a possibility of greater concentrations of VOCs in soils closer to the location of the vapor degreaser.

6.0 WARRANTY AND LIMITATION OF LIABILITY

EPS Environmental's Phase II Limited Subsurface Investigation was of limited scope. The Phase II Limited Subsurface Investigation was structured to screen for the presence of petroleum soil contamination in the area in which the borings were conducted, and was not intended to be an all inclusive search for soil contamination across the subject Property. However, the Phase II Limited Subsurface Investigation can provide an indication of the presence or absence of those contaminants sampled and analyzed for at the sample locations, at the time the samples were obtained in the sampled media.

EPS Environmental warrants that the findings and conclusions contained in this Report have been promulgated in accordance with generally accepted environmental engineering methods. These environmental methods have been developed to provide the Client with information regarding apparent indications of existing or potential environmental conditions relating to the soils and are limited to the conditions observed at the time that the Phase II Limited Subsurface Investigation was conducted. This Report is also limited to the information available at the time it is prepared. There is a distinct possibility that conditions may exist at the subject Property which were not apparent during the Phase II Limited Subsurface Investigation. EPS Environmental makes no other warranties, expressed or implied.

6.1 Confidentiality

EPS Environmental shall hold all field observations, borings, logs, analysis, laboratory reports and other reports in strict confidence and shall not disclose these items except to the Client and American National Bank and Trust Company of Chicago, or except as ordered by any state or federal agency or court of law. In the event that EPS Environmental is ordered by a state or federal agency or court of law to make any such disclosures, the Client and American National Bank and Trust Company of

Chicago shall hold EPS Environmental harmless from liability for any and all damages that the Client and American National Bank and Trust Company of Chicago may suffer due to EPS Environmental's disclosure. In addition, the Client and American National Bank and Trust Company of Chicago shall indemnify EPS Environmental from any and all damages EPS Environmental may suffer due to any action which results in an order that EPS Environmental make a disclosure.

6.2 Reliance on Phase II Limited Subsurface Investigation and Report

The Phase II Limited Subsurface Investigation and Report has been conducted exclusively for the Client and American National Bank and Trust Company of Chicago, and it is intended that only those parties will rely on the Report. The Phase II Limited Subsurface Investigation and Report will be solely for the benefit of the Client and American National Bank and Trust Company of Chicago and may not be relied upon by other parties.

FIGURE 1

Boring Location Map

APPENDIX A
Geologic Boring Logs

APPENDIX B

Chain of Custody Record and Laboratory Analytical Data



Doc#: 0711449011 Fee: \$52.50
Eugene "Gene" Moore RHSP Fee: \$10.00
Cook County Recorder of Deeds
Date: 04/24/2007 11:16 AM Pg: 1 of 15

PREPARED BY:

Name: Acme Finishing, Inc.
Attention: Dennis Walters

Address: 1595 Oakton Street
Elk Grove Village, Illinois

RETURN TO:

Name: Acme Finishing, Inc.
Attention: Dennis Walters

Address: 1595 Oakton Street
Elk Grove Village, Illinois 60007

(THE ABOVE SPACE FOR RECORDER'S OFFICE)

LEAKING UNDERGROUND STORAGE TANK ENVIRONMENTAL NOTICE

THE OWNER AND/OR OPERATOR OF THE LEAKING UNDERGROUND STORAGE TANK SYSTEM(S) ASSOCIATED WITH THE RELEASE REFERENCED BELOW, WITHIN 45 DAYS OF RECEIVING THE NO FURTHER REMEDIATION LETTER CONTAINING THIS NOTICE, MUST SUBMIT THIS NOTICE AND THE REMAINDER OF THE NO FURTHER REMEDIATION LETTER TO THE OFFICE OF THE RECORDER OR REGISTRAR OF TITLES OF COOK COUNTY IN WHICH THE SITE DESCRIBED BELOW IS LOCATED.

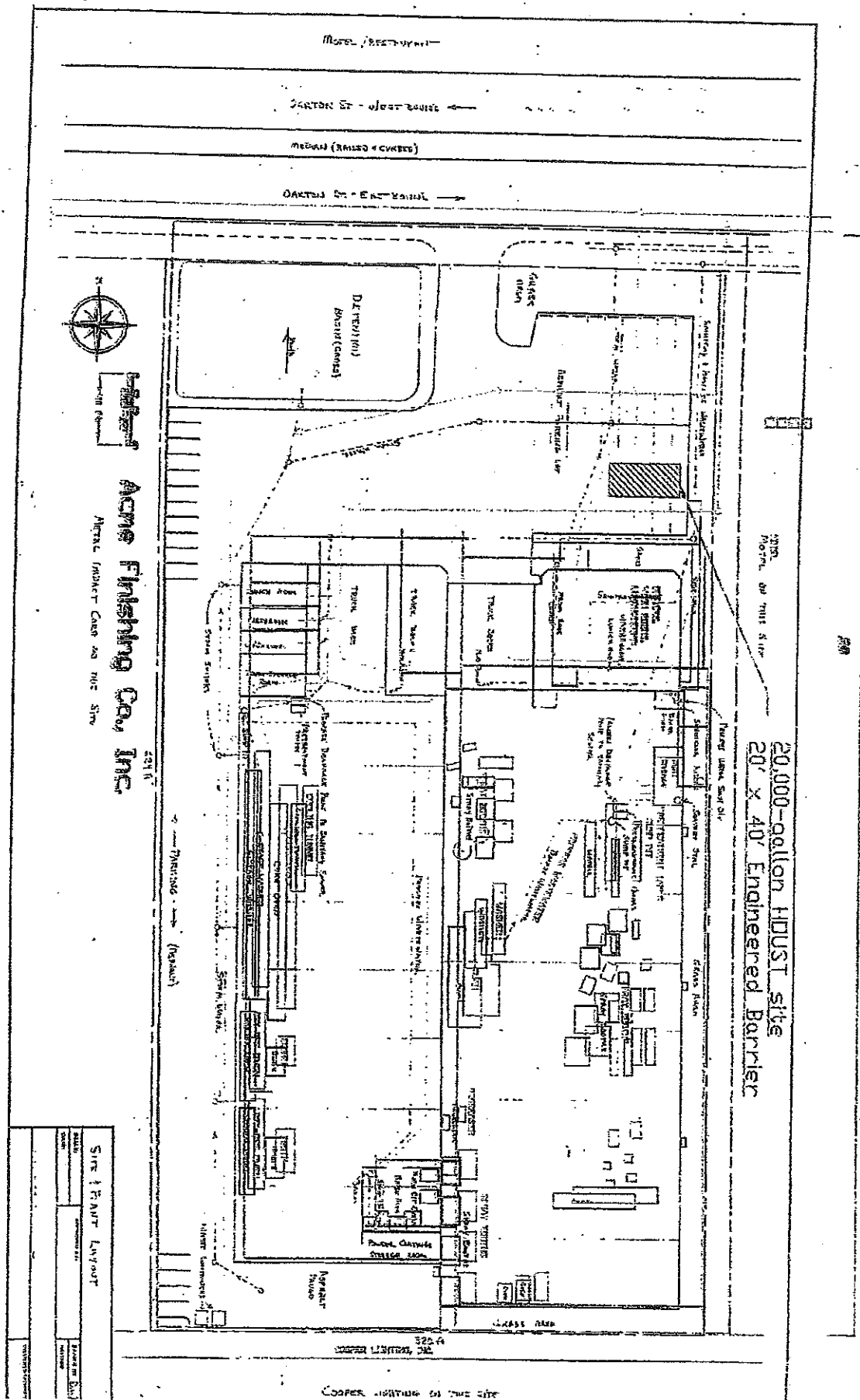
Illinois EPA Number: 0314400002

LUST Incident No.: 911495

Acme Finishing, Inc., the owner and/or operator of the leaking underground storage tank system(s) associated with the above-referenced incident, whose address is 1595 Oakton Street, Elk Grove Village, Illinois, has performed investigative and/or remedial activities for the site identified as follows:

1. Legal Description or Reference to a Plat Showing the Boundaries: Lot 160 in Higgins Industrial Park Unit 112, being a subdivision I the Northeast Quarter Section of the Section 27, Township 41 North, Range 11, East of the Third Principal Meridian, In Cook County, Illinois
2. Common Address: 1595 Oakton Street, Oak Grove Village, Illinois
3. Real Estate Tax Index/Parcel Index Number: 08-27-201-003-0000
4. Site Owner: DeeJay Realty, LLC
5. Land Use Limitation: There are no land use limitations.
6. See the attached No Further Remediation Letter for other terms.

DW





ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

217/782-6762

CERTIFIED MAIL

7004 2510 0001 8621 9440

APR 09 2007

Acme Finishing, Inc.
Attention: Dennis Walters
1595 Oakton Street
Elk Grove Village, Illinois 60007

Re: LPC #0314400002 -- Cook County
Elk Grove Village/ Acme Finishing, Inc.
1595 Oakton Street
Leaking UST Incident No. 911495
Leaking UST Technical File

Dear Mr. Walters:

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Corrective Action Completion Report submitted for the above-referenced incident. This information is dated July 26, 2005 and was received by the Illinois EPA on March 14, 2007. Citations in this letter are from 35 Illinois Administrative Code (35 Ill. Adm. Code).

The Corrective Action Completion Report and the Professional Engineer Certification submitted pursuant to 35 Ill. Adm. Code 731 indicate remediation has been successfully completed.

Based upon the certification by Ken A. Neal, a Licensed Professional Engineer, and based upon other information in the Illinois EPA's possession, your request for a no further remediation determination is granted under the conditions and terms specified in this letter.

Issuance of this No Further Remediation Letter (Letter), based on the certification of the Licensed Professional Engineer, signifies that: (1) all statutory and regulatory corrective action requirements applicable to the occurrence have been complied with; (2) all corrective action concerning the remediation of the occurrence has been completed; and (3) no further corrective action concerning the occurrence is necessary for the protection of human health, safety, and the environment. This Letter shall apply in favor of the following parties:

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

1. Acme Finishing, Inc., the owner or operator of the underground storage tank system(s).
2. Any parent corporation or subsidiary of such owner or operator.
3. Any co-owner or co-operator, either by joint tenancy, right-of-survivorship, or any other party sharing a legal relationship with the owner or operator to whom the Letter is issued.
4. Any holder of a beneficial interest of a land trust or inter vivos trust whether revocable or irrevocable.
5. Any mortgagee or trustee of a deed of trust of such owner or operator.
6. Any successor-in-interest of such owner or operator.
7. Any transferee of such owner or operator whether the transfer was by sale, bankruptcy proceeding, partition, dissolution of marriage, settlement or adjudication of any civil action, charitable gift, or bequest.
8. Any heir or devisee of such owner or operator.

This Letter and all attachments, including but not limited to the Leaking Underground Storage Tank Environmental Notice, must be filed within 45 days of receipt as a single instrument with the Office of the Recorder or Registrar of Titles in the county in which the above-referenced site is located. In addition, the Groundwater Ordinance (photocopy attached) must be filed as an attachment of this Letter with the Office of the Recorder or Registrar of Titles of the applicable county.

This Letter shall not be effective until officially recorded by the Office of the Recorder or Registrar of Titles of the applicable county in accordance with Illinois law so it forms a permanent part of the chain of title for the above-referenced property. Within 30 days of this Letter being recorded, an accurate and official copy of this Letter, as recorded, shall be obtained and submitted to the Illinois EPA. For recording purposes, it is recommended that the Leaking Underground Storage Tank Environmental Notice of this Letter be the first page of the instrument filed.

CONDITIONS AND TERMS OF APPROVAL

LEVEL OF REMEDIATION AND LAND USE LIMITATIONS

1. The remediation objectives for the above-referenced site, more particularly described in the Leaking Underground Storage Tank Environmental Notice of this Letter, were established in accordance with the requirements of the Tiered Approach to Corrective Action Objectives (35 Ill. Adm. Code 742) rules.

2. As a result of the release from the underground storage tank system(s) associated with the above-referenced incident, the above-referenced site, more particularly described in the attached Leaking Underground Storage Tank Environmental Notice of this Letter, shall not be used in a manner inconsistent with the following land use limitation: There are no land use limitations.
3. The land use limitation specified in this Letter may be revised if:
 - a. Further investigation or remedial action has been conducted that documents the attainment of objectives appropriate for the new land use; and
 - b. A new No Further Remediation Letter is obtained and recorded in accordance with Title XVII of the Act and regulations adopted thereunder.

PREVENTIVE, ENGINEERING, AND INSTITUTIONAL CONTROLS

4. Preventive: None.

Engineering: A building and asphalt barrier that is sufficient in thickness to inhibit the inhalation and ingestion of the contaminated media must remain over the contaminated soil as outlined in the attached Site Base Map. This building and asphalt barrier is to be properly maintained as an engineered barrier to inhibit inhalation and ingestion of the contaminated media.

Institutional: This Letter shall be recorded as a permanent part of the chain of title for the above-referenced site, more particularly described in the attached Leaking Underground Storage Tank Environmental Notice of this Letter.

Groundwater Use Ordinance

Elk Grove Village Ordinance #1538 effectively prohibits the installation of potable water supply wells (and the use of such wells) and is an acceptable institutional control under the following conditions:

Each affected or potentially affected (as shown through contaminant modeling) property owner and the City of Elk Grove Village must receive written notification from the owner or operator desiring to use the ordinance as an institutional control that groundwater remediation objectives have been approved by the Illinois EPA. Written proof of this notification shall be submitted to the Illinois EPA in accordance with 35 Ill. Adm. Code 742.1015(b) and (c) within 45 days from the date this Letter is recorded. The notification shall include:

- a. The name and address of the unit of local government;
- b. The citation of the ordinance used as an institutional control in this Letter;
- c. A description of the property being sent notice by adequate legal description or by reference to a plat showing the boundaries;
- d. A statement that the ordinance restricting the groundwater use was used by the Illinois EPA in reviewing a request for groundwater remediation objectives;
- e. A statement as to the nature of the release and response action with the name, address, and Illinois EPA inventory identification number; and
- f. A statement as to where more information may be obtained regarding the ordinance.

The following activities shall be grounds for voidance of the ordinance as an institutional control and this Letter:

- a. Modification of the referenced ordinance to allow potable uses of groundwater.
- b. Approval of a site-specific request, such as a variance, to allow use of groundwater at the site.
- c. Violation of the terms of a recorded institutional control.

As a part of its corrective action, the leaking underground storage tank site has relied upon Ordinance # 1538 for Elk Grove Village that prohibits potable uses of groundwater as defined therein.

5. Failure to establish, operate, and maintain controls in full compliance with the Act, applicable regulations, and the approved Corrective Action Plan may, if applicable, result in voidance of this Letter.

OTHER TERMS

6. Any contaminated soil or groundwater removed or excavated from, or disturbed at, the above-referenced site, more particularly described in the Leaking Underground Storage Tank Environmental Notice of this Letter, must be handled in accordance with all applicable laws and regulations under 35 Ill. Adm. Code Subtitle G.
7. Further information regarding the above-referenced site can be obtained through a written request under the Freedom of Information Act (5 ILCS 140) to:

Illinois Environmental Protection Agency
Attention: Freedom of Information Act Officer
Bureau of Land - #24
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

8. Should the Illinois EPA seek to void this Letter, the Illinois EPA shall provide notice to the owner or operator of the leaking underground storage tank(s) associated with the above-referenced incident and the current title holder of the real estate on which the tanks were located, at their last known addresses. The notice shall specify the cause for the voidance, explain the provisions for appeal, and describe the facts in support of the voidance. Specific acts or omissions that may result in the voidance of this Letter include, but shall not be limited to:
 - a. Any violation of institutional controls or industrial/commercial land use restrictions;
 - b. The failure to operate and maintain preventive or engineering controls or to comply with any applicable groundwater monitoring plan;
 - c. The disturbance or removal of contamination that has been left in place in accordance with the Corrective Action Plan or Completion Report;
 - d. The failure to comply with the recording requirements for the Letter;
 - e. Obtaining the Letter by fraud or misrepresentation; or

Page 6

- f. Subsequent discovery of contaminants, not identified as part of the investigative or remedial activities upon which the issuance of the Letter was based, that pose a threat to human health or the environment.

Submit an accurate and official copy of this Letter, as recorded, to:

Illinois Environmental Protection Agency
Bureau of Land - #24
Leaking Underground Storage Tank Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, IL 62794-9276

If you have any questions or need further assistance, please contact the Illinois EPA project manager, Donna Wallace, at 217/ 524-1283.

Sincerely,



Thomas A. Henninger
Unit Manager
Leaking Underground Storage Tank Section
Division of Remediation Management
Bureau of Land

TAH:DW:dw\

Attachments: Leaking Underground Storage Tank Environmental Notice.
Groundwater Ordinance
Site base map locating building and area of asphalt over the previous heating oil UST.

c: Environmental Technologies Corp./ Luther Landon
BOL File

MEMORANDUM OF UNDERSTANDING BETWEEN ELK GROVE VILLAGE AND THE
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY REGARDING THE USE OF A
LOCAL GROUNDWATER OR WATER WELL ORDINANCE AS AN ENVIRONMENTAL
INSTITUTIONAL CONTROL

I. PURPOSE AND INTENT

- A. This Memorandum of Understanding ("MOU") is entered into between Elk Grove Village and the Illinois Environmental Protection Agency ("Illinois EPA") for the purpose of satisfying the requirements of 35 Ill. Adm. Code 742.1015 for the use of groundwater or water well ordinances as environmental institutional controls. The Illinois EPA has reviewed the groundwater or water well ordinance of Elk Grove Village (Attachment A) and determined that the ordinance prohibits the use of groundwater for potable purposes and/or the installation and use of new potable water supply wells by private entities but does not expressly prohibit those activities by the unit of local government itself. In such cases, 35 Ill. Adm. Code 742.1015(a) provides that the unit of local government may enter into an MOU with the Illinois EPA to allow the use of the ordinance as an institutional control.
- B. The intent of this Memorandum of Understanding is to specify the responsibilities that must be assumed by the unit of local government to satisfy the requirements for MOUs as set forth at 35 Ill. Adm. Code 742.1015(i).

II. DECLARATIONS AND ASSUMPTION OF RESPONSIBILITY

In order to ensure the long-term integrity of the groundwater or water well ordinance as an environmental institutional control and that risk to human health and the environment from contamination left in place in reliance on the groundwater or water well ordinance is effectively managed, Elk Grove Village hereby assumes the following responsibilities pursuant to 35 Ill. Adm. Code 742.1015(i):

- A. Elk Grove Village will notify the Illinois EPA Bureau of Land of any proposed ordinance changes or requests for variance at least 30 days prior to the date the local government is scheduled to take action on the proposed change or request (35 Ill. Adm. Code 742.1015(i)(4));
- B. Elk Grove Village will maintain a registry of all sites within its corporate limits that have received "No Further Remediation" determinations from the Illinois EPA (35 Ill. Adm. Code 742.1015(i)(5));

- C. Elk Grove Village will review the registry of sites established under paragraph II.B. prior to siting public potable water supply wells within the area covered by the ordinance (35 Ill. Adm. Code 742.1015(i)(6)(A));
- D. Elk Grove Village will determine whether the potential source of potable water has been or may be affected by contamination left in place at the sites tracked and reviewed under paragraphs II.B. and C. (35 Ill. Adm. Code 742.1015(i)(6)(B)); and
- E. Elk Grove Village will take action as necessary to ensure that the potential source of potable water is protected from contamination or treated before it is used as a potable water supply (35 Ill. Adm. Code 742.1015(i)(6)(C)).

NOTE: Notification under paragraph II.A. above or other communications concerning this MOU should be directed to:

Manager, Division of Remediation Management
Bureau of Land
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, IL 62794-9276

III. SUPPORTING DOCUMENTATION

The following documentation is required by 35 Ill. Adm. Code 742.1015(i) and is attached to this MOU:

- A. Attachment A: A copy of the groundwater or water well ordinance certified by the city clerk or other official as the current, controlling law (35 Ill. Adm. Code 742.1015(i)(3));
- B. Attachment B: Identification of the legal boundaries within which the ordinance is applicable (certification by city clerk or other official that the ordinance is applicable everywhere within the corporate limits; if ordinance is not applicable throughout the entire city or village, legal description and map of area showing sufficient detail to determine where ordinance is applicable) (35 Ill. Adm. Code 742.1015(i)(2));
- C. Attachment C: A statement of the authority of the unit of local government to enter into the MOU (council resolution, code of ordinances, inherent powers of mayor or other official, signing MOU -- attach copies) (35 Ill. Adm. Code 742.1015(i)(1)).

IN WITNESS WHEREOF, the lawful representatives of the parties have caused this MOU to be

signed as follows:

FOR: Elk Grove Village

BY: Craig B. Johnson
(Name, and title of signatory)
Village President

DATE: June 24, 1997

FOR: Illinois Environmental Protection
Agency

BY: _____
(Name and title of signatory)

DATE: _____



Village President
CRAIG B. JOHNSON

Village Clerk
PATRICIA S. SMITH

Village Manager
GARY E. PARRIN

Village Trustees
NANCY J. CZARNIK
BART K. DILL
PATTON L. FEICHTER
SAMUEL L. LISSNER
JAMES R. PETRI
CHRIS PROCHNO

STATE OF ILLINOIS

COUNTIES OF COOK AND DU, PAGE)

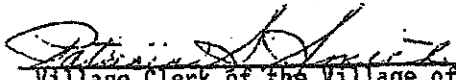
SS

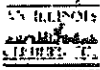
CERTIFICATE OF CLERK

This is to certify that I, Patricia S. Smith, am the Village Clerk of the Village of Elk Grove Village, Cook and DuPage Counties, Illinois, and as such official am the custodian of the records and seal of said Village; and that the attached is a true and correct copy of Ordinance No. 1538, passed by the President and Board of Trustees of said Village at a meeting duly held on the 28th day of September, 1982, which Ordinance No. 1538 was approved by the Village President, all as appears from the official records which are in my custody.

Witness my hand and the official seal of said Village of Elk Grove Village this 25th day of June, 1997.

(SEAL)


Village Clerk of the Village of Elk
Grove Village, Counties of Cook and
DuPage, Illinois



ORDINANCE NO. 1538AN ORDINANCE AMENDING CHAPTER 22A WATER AND SEWER OF THE MUNICIPAL CODE TO PROHIBIT NON-VILLAGE WATER USE AND AMEND THE PENALTIES CONTAINED THEREIN

BE IT ORDAINED by the President and Board of Trustees of the Village of Elk Grove Village, Counties of Cook and DuPage, Illinois as follows:

SECTION 1. That Article 1, General Provisions of Chapter 22A, Water and Sewer of the Municipal Code be and is hereby amended by deleting the present Section 22A112, Penalty, and substituting in its place the following:

22A112. Prohibition of Non-Village Water Use. It shall be unlawful for any person, firm or corporation to construct, install, maintain or utilize a water system or well other than the water supply and water services of the Village. The provisions of this Section shall be applicable to all water usage, including, but not limited to, domestic, commercial and industrial uses and water for outdoor purposes. The provisions of this Section shall not apply to private water systems installed prior to the effective date of this Ordinance, the use of which has been previously approved by the Village.

22A113. Penalty. Any person, firm, or corporation violating any provision of this Article 1 shall be subject to a fine of not less than Twenty-five (\$25.00) Dollars nor more than Five Hundred (\$500.00) Dollars for each offense and a separate offense shall be deemed committed on each day during or on which a violation occurs or continues.

In addition to any penalty which may be imposed herein, any person, firm or corporation violating the provisions of this Article shall be subject to having their water services terminated, suspended or revoked. Notice of the intent by the Village to terminate, suspend or revoke such service shall be given to any such person, firm or corporation at least fifteen (15) days in advance of the date established for termination, and a person so notified shall have an opportunity to request, in writing, a hearing before the Village Manager to show cause as to why his water service shall not be terminated, suspended or revoked. The notice request must be filed with the Village Manager no later than five (5) days from the proposed termination date and thereafter the Village Manager shall schedule a hearing within ten (10) days of the receipt of said notice request. Pending any such hearing, all water use privileges shall remain in full force and effect, subject to compliance with the provisions of this Chapter. The Village Manager shall have the authority during the course of any such hearing to suspend or revoke water service or to impose such sanctions on the water user short of suspension, or revocation, including the collection of unpaid water usage, unpaid water bills, interest due thereon, and such other monetary fines or sanctions which the Village Manager deems in the best interest of the Village for the express purpose of enforcing the provisions of this Article.

SECTION 2. That Section 22A206, 22A706 and 22A904 are hereby amended to read as follows:

Penalty. Any person, firm or corporation violating any provision of this Article shall be subject to a fine of not less than Twenty-five (\$25.00) Dollars nor more than Five Hundred (\$500.00) Dollars for each offense and a separate offense shall be deemed committed on each day during or on which a violation occurs or continues.

SECTION 3. That this Ordinance shall be in full force and effect from and after its passage, approval and publication according to law.

VOTES: AYES: 6

NAYS: 0

ABSENT: 0

APPROVED:

Charles J. Zettek
Village President

ATTEST:

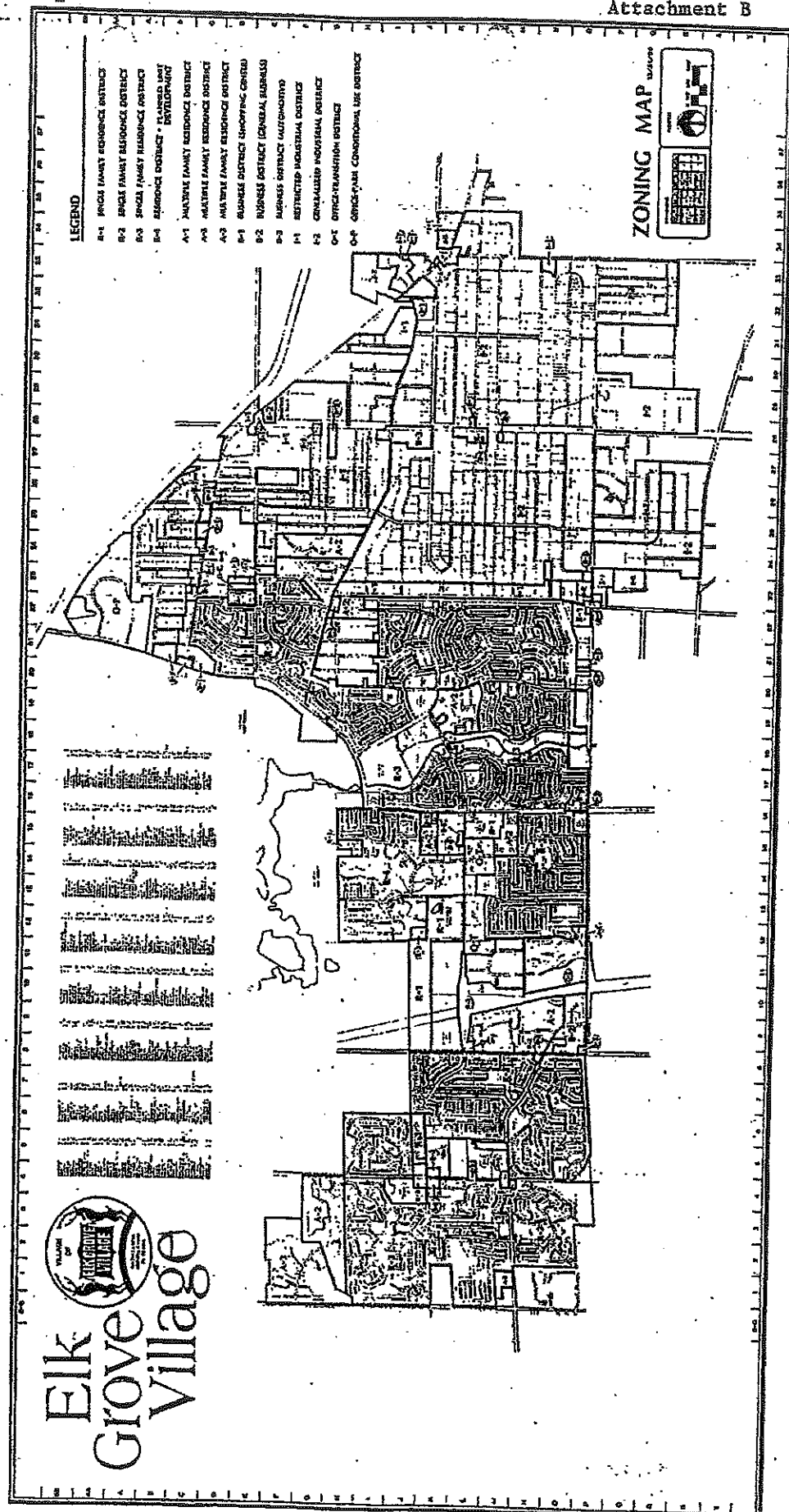
Patricia S. Smith
Village Clerk

PASSED this 28th day of September, 1982.

APPROVED this 28th day of September, 1982.

PUBLISHED this 6th day of October, 1982.

In the Elk Grove Daily Herald



Official Receipt for Recording In:

Cook County Recorder of Deeds
118 N. Clark

Chicago, Illinois 60610

Issued To:
WALKIN

Recording Fees

Document Description	Number	Book/Page	Recording Amount
NISC	0711449011		\$52.50
RHSPS			\$10.00
			\$62.50

Collected Amounts

Payment Type	Amount
Cash	\$62.50
	\$62.50

Change Due : \$.00

Thank You
EUGENE "GENE" MOORE - Recorder of Deeds

By: Denise Wilson

Receipt# Date Time
49034339 04/24/2007 11:23a

Determination: Soil sampling, testing of UST**PA/VSI Or RFA FILE REVIEW CHECKLIST**

Facility Name: Acme Finishing Company, Inc. _____

EPA ID: ILD 005 087 812 _____ City: Elk Grove Village _____ State: IL _____

Name of Reviewer: Maureen McHugh _____ Date of Review: 7/30/08 _____

1	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Is this a one folder site?
2	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Are there Superfund files for this site?
3	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you Read the Executive Summary?
			There are: <u> 5 </u> SWMUs and <u> 2 </u> AOCs at this site.
4	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you review the regulatory history?
5	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Does the facility have interim status or a permit?
			This facility is a: <u> </u> SQG, <u> X </u> LQG, or <u> </u> Less than 90 day.
6	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Was the Facility closed per RCRA? RCRAInfo 380 (1985)
			If Yes, was the closure: <u> </u> CC, or <u> </u> CIP.
7	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Are there documented (historical) releases? Briefly describe on Page 2.
8	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Were there releases identified during the inspection? Briefly describe on Page 2.
9	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Do you agree with the Conclusions and Recommendations?
			If No, briefly describe on Page 2.

As a result of your review of the PA/VSI or RFA file, please classify this site as:

 No further corrective action recommended or warranted: These are sites that closed the regulated units and any other SWMUs or AOCs at the site did not warrant any further corrective action (no historic releases or evidence of releases observed during the Visual Site Inspection).

 X Further Action Required: Soil or sediment sampling or groundwater sampling or monitoring or any type of investigation that was recommended in the report in response to a documented or observed release at any SWMU or AOC and where such investigation, whether being addressed during the inspection or after, does not have the necessary documentation in the facility record files.

 More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.

PA/VSİ Or RFA FILE REVIEW CHECKLIST

Notes

Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each release, please identify the SWMU or AOC and a one or two line description of release.

There was white staining on the outdoor drum storage area, and it was pitted and cracked in places. The wall and ground adjacent to the outside paint solvent fill ports were stained. Both releases were well contained and posed no threat to the environment.

PA/VSİ Recommendations

Soil sampling and secondary containment at the outdoor drum storage area (SWMU1) and testing of UST at AOC2
UST LUST Closed 2007—incident #911495



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

RECEIVED
WMD RCRA
RECORD CENTER
APR 08 1993
Comp

REPLY TO ATTENTION OF:

5HR-12

March 25, 1991

Mr. Dennis Walters
General Manager
Acme Finishing Co., Inc.
1595 Oakton St.
Elk Grove Village, IL 60007

Re: Visual Site Inspection
Acme Finishing Co., Inc.
ILD 005 087 812

Dear Mr. Walters:

At your request during your telephone conversation with Mr. William Dytrych of Resource Applications, Inc. on this date, the Preliminary Assessment and Visual Site Inspection of your facility will be conducted on April 11, 1991 at 9:00 a.m.

This letter confirms agreement by both you and Mr. Dytrych to this request.

Sincerely yours,

Shari L. Branch

for Kevin M. Pierard Chief
OH/MN Technical Enforcement Section

cc: Donna Czech, IEPA-Maywood
Larry Estep, IEPA-Land Pollution Control Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

RECEIVED
VOLUME 1000
RECORD CENTER

APR 8 1993

Comp

REPLY TO ATTENTION OF:

5HR-12

March 22, 1991

Mr. Dennis Walters
General Manager
Acme Finishing Co., Inc.
1595 Oakton St.
Elk Grove Village, IL 60007

Re: Visual Site Inspection
Acme Finishing Co., Inc.
ILD 005 087 812

Dear Mr. Walters:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA). The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

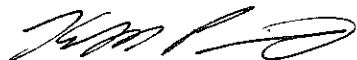
The VSI has been scheduled for April 4, 1991. The inspection team will consist of William Dytrych and Michael Gorman of Resource Applications, Inc., contractors for the U.S. EPA.

Representatives of the Illinois Environmental Protection Agency may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Enclosed is a summary of our current knowledge and data gaps.

If you have any questions, please contact me at (312) 886-4448 or Sheri Bianchin at (312) 886-4446. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions portion may be made available upon request.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Donna Czech, IEPA - Maywood
Larry Eastep, IEPA - Land Pollution Control Division

ATTACHMENT

Acme Finishing Co., Inc.
1595 Oakton St.
Elk Grove Village, Illinois 60007

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Drum Storage Area: A 28' X 46' paved and fenced area used to accumulate 55-gallon drums of both hazardous and non-hazardous waste, including paint wastes, dirty paint solvents, dirty trichloroethylene, spent methylene chloride, and spent caustic potash.
2. Treatment Tanks: Located within an 8' X 8' area inside the plant, and using paint solvents, methylene chloride, trichloroethylene and caustic potash.
3. Spent-solvent recycling still: Process-contaminated trichloroethylene (TCE) is recycled into reusable TCE and still bottoms.

From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
 - What are the start-up and closure dates of the above SWMUs?
 - What types of wastes are the SWMUs currently/formerly used for?
 - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding any other owner/operators at this location.
 3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
 4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

3.1

REPLY TO ATTENTION OF:

5HR-12

March 22, 1991

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Elk Grove Village, IL 60007

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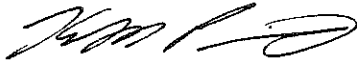
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- Flow diagrams showing waste streams and waste management practices.

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PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**ACME FINISHING COMPANY, INC.
ELK GROVE VILLAGE, ILLINOIS**

ILD 005 087 812

10/31/91

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 005 087 812
Date Prepared	:	October 31, 1991
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL01
Prepared by	:	Resource Applications Inc.
Principal Investigator	:	William Dytrych, Ph.D.
Telephone Number	:	(312) 332-2230
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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- A - EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B - VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C - VISUAL SITE INSPECTION FIELD NOTES
- D - PROCESS FLOW DIAGRAM

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EXECUTIVE SUMMARY

ENFORCEMENT
CONFIDENTIAL

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Acme Finishing Company, Inc. (Acme) facility in Elk Grove Village, Illinois. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

Acme is located in a light-industrial area of Elk Grove Village, a northwestern suburb of Chicago, Illinois. The company provides custom paint finishing services to manufacturers of diversified metal products and has been in operation since 1976. The 50-acre site is currently regulated as a generator of hazardous wastes. The primary wastes generated are paint solids and solvents (F003/F005), including naphtha and xylene, which are used in their baked-on coating process. These wastes are drummed and either distilled on-site or transported off-site for disposal. Historically, many of the paints at the facility have contained lead, but all paint products currently in use are lead-free. There is no evidence of past remedial or removal corrective action at this facility.

The PA/VSI identified the following 5 SWMUs and 2 AOCs at the facility:

Solid Waste Management Units

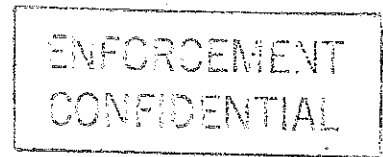
1. Outdoor Drum Storage Area
2. Special Waste Dumpster
3. Burn-off Oven
4. Wastewater Treatment Tanks
5. Paint Solvent Still

Areas of Concern

1. Outside Paint Solvent Fill Ports and USTs
2. Underground Storage Tanks under North Parking Lot

Due to a lack of secondary containment, the potential for release to ground water, surface water, air and soil from the Outdoor Drum Storage Area (SWMU 1) is moderate. Other SWMUs at this facility have a low potential for release to the environment. They are either located indoors or

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their overflow is routed to drains, and, in turn to wastewater treatment tanks whose contents are treated before release to the sewer system. The only evidence of past releases is staining on the ground in the Outdoor Drum Storage Area (SWMU 1) and around the Outside Solvent Fill Ports (AOC 1), and there is no documented soil contamination at the facility.

The release potential to ground water and soil from the AOCs is moderate, as they are underground storage tanks which are not monitored and are subject to corrosion. The potential for release to surface water or air is low.

Elk Grove Village is served by a municipal water system whose source is Lake Michigan. Thus, the community is not dependent upon water from ground water wells. There are no sensitive environments or habitats of endangered species within two miles of the site.

The nearest residences to the site are three-quarters of a mile away to the west. Access to the facility is unrestricted, other than that the warehouse is locked during non-business hours.

RAI recommends that soil sampling be conducted beneath the stained and cracked areas of the asphalt pad in the Outdoor Drum Storage Area (SWMU 1), and that adequate secondary containment be constructed, preferably in the form of a berm around the area. No further action is recommended at this time for any of the other SWMUs. For AOC 1 (Outside Paint Solvent Fill Ports and USTs) no further action is recommended pending results from the ongoing tank testing. RAI recommends that tank testing be conducted, under the proper authority, for AOC 2 (Underground Storage Tanks under North Parking Lot).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 Team member, provide necessary assistance to complete the PA/VSI activities for Acme Finishing Company, Inc. (Acme).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells.
- Closed and abandoned units.
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units.
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Acme Finishing Company, Inc. (Acme) facility (ILD 005 087 812) in Elk Grove Village, Illinois. The PA was completed on April 10, 1991. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed publications from the U.S. Department of Agriculture (USDA), U.S. Geological Survey (USGS), Federal Emergency Management Agency (FEMA) and the Illinois State Geological Survey (ISGS).

The VSI was conducted on April 11, 1991. It included interviews with Acme facility representatives and a walk-through inspection of the facility. Five SWMUs and two AOCs were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 12 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

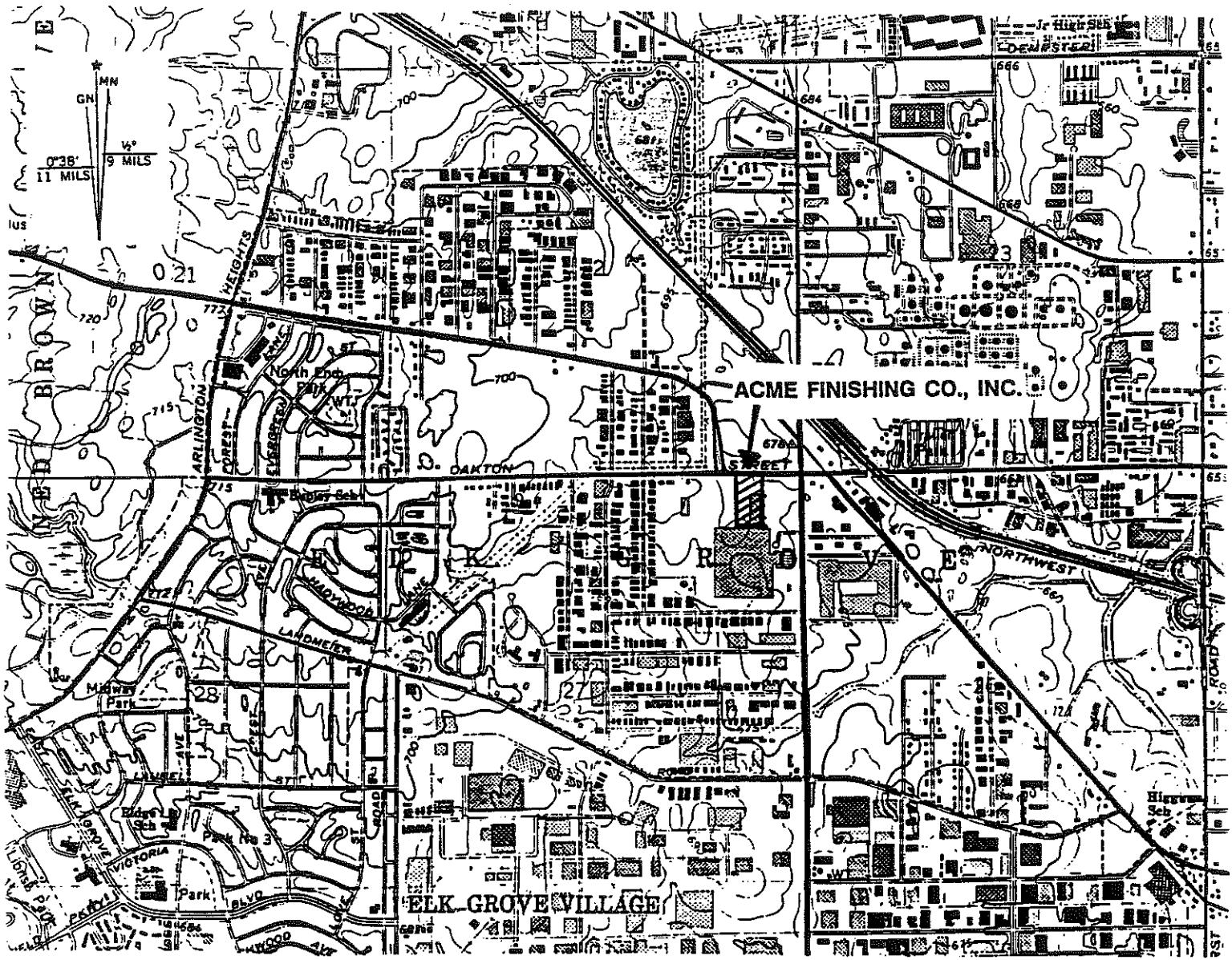
The Acme facility is located at 1595 Oakton Street, Elk Grove Village, Illinois, in Cook County. Elk Grove Village is a northwest suburb of Chicago, and the facility is located in a predominantly light-industrial area (Figure 1). The 50-acre site is situated on the south side of Oakton Street, which consists of four lanes. A motel is located directly to the east and an empty lot belonging to a mushroom farm is located to the west. To the south is the manufacturing plant for Halo Lighting, Acme's largest account; in fact, the Halo Lighting and Acme facilities are directly connected. North of the Acme facility, across Oakton, are the Midway Motor Lodge and a small office complex.

2.2 FACILITY OPERATIONS

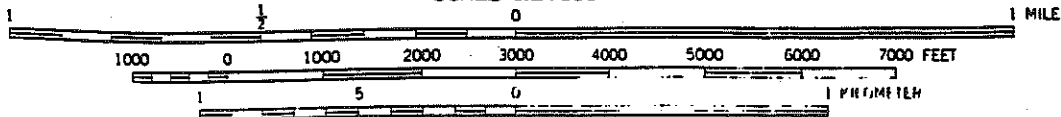
Acme provides custom paint-finishing services for manufacturers of diversified metal products. Starting materials are prefabricated metal parts of mostly steel and aluminum. In the past, aluminum/zinc die-casting materials were also treated. Paint coatings are applied to these parts and then baked on. The coatings include: high- and low-solid solvent-based paints; water-based paints; and, dry powder coatings electrostatically applied. Acme has operated this site since August 9, 1976 when the facility moved from Rosemont, Illinois (Figure 2). Some years prior to Acme's arrival, McGraw-Edison Co. purchased a 50-acre tract of farmland which comprised the current Acme site. Halo Lighting, an operating unit of McGraw-Edison, set up its facilities shortly after the purchase. In 1976, at the prompting of Halo Lighting, Acme also moved to the property. There are approximately 80 employees, 20 to 30 of whom are temporary.

Waste solvents used as paint thinners (e.g. xylene, naphtha, and formerly, toluene - F003/F005) are distilled on site. Trichloroethylene (TCE) is used as a degreaser, and the 70% TCE/ 30% oil mix resulting from the degreasing process (F001) is distilled on site. Still bottoms from both the paint solvent and TCE distillation processes are sent to EWR in Coal City, IL, which arranges for them to be incinerated. If the TCE is not up to specification after distillation, it is recycled on-site by Solvent Systems International, in one of the facility's parking lots.


FIGURE 1
FACILITY LOCATION

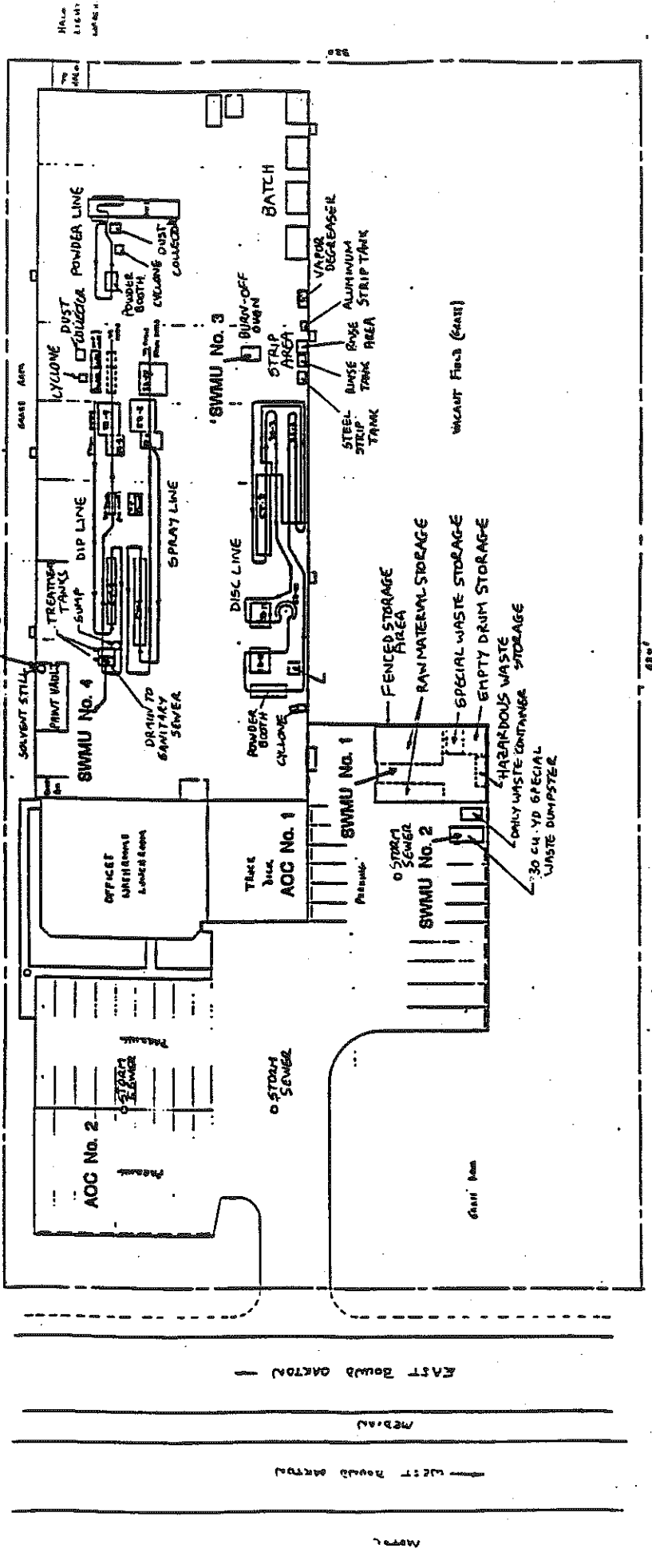


SCALE 1:24,000



CONTOUR INTERVAL 5 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

Acme Finishing Co., Inc. Elk Grove Village, Illinois
Figure 1 Facility Location
Scale 1:24,000 Source: USGS, 1981
 Resource Applications, Inc.



APPROVED BY	DATE
DENNIS WALTERS	5/10/91
ACME FINISHING CO. INC.	

Acme Finishing Co., Inc. Elk Grove Village, Illinois
Figure 2 Facility Layout
Approximate scale: 1" = 78'
Source: Dennis Walters, Acme Finishing
Resource Applications, Inc.

Hot stripper waste comprises two streams: caustic potash (KOH), which is sent through the wastewater treatment system for neutralization; and a diethanolamine/monoethanolamine blend (DEA/MEA - F017), which is drummed and shipped to EWR, which transports the waste for incineration. Excess paint that has accumulated on racks and hooks in application areas is burned on site in a controlled-pyrolysis oven (the Burn-off Oven - SWMU 3). The waste ash is managed in the Special Waste Dumpster (SWMU 2) along with spray booth filters, paint scrapings and plastic drip sheets from under the drip line. These wastes are removed by Garden City to Settler's Hill, Batavia, Illinois. Skimmed oil from washers and settling tank sludge is drummed and sent to STA Decanting in Hammond, Indiana. Washer sludge, which contains phosphoric acid and iron phosphate, is drummed and transported off-site for disposal by Dombrowski & Holmes or Land & Lakes. All drummed waste is stored in the Outdoor Drum Storage Area (SWMU 1) prior to removal from the site.

Table 1 lists the Acme facility's Solid Waste Management Units (SWMUs).

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Outdoor Drum Storage Area	Yes	RCRA closure approved in 1985; now used for less than 90 day storage.
2	Special Waste Dumpster	No	Active
3	Burn-off Oven	No	Active
4	Wastewater Treatment Tanks	No	Active
5	Paint Solvent Still	No	Active

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.

Paints used at the Acme facility are mainly white, black or grey. Some red, orange, and yellow tinted paints have been used in the past, but these contained lead, and Acme is currently using only lead-free paints. There are 5 coating departments in the shop; four use conveyor systems and are known respectively as the disc line, spray line, dip line and powder line (Attachment D). The remaining department consists of a batch line. On the conveyor lines, the metal parts are first washed in a spray parts washer containing water (96-97%) with iron phosphate and phosphoric acid as cleaning agents (3-4%); they are then dipped in a kerosene-based solvent parts cleaner. This solvent is treated in the Paint Solvent Still (SWMU 5), while the sludge from the washer is drummed and disposed of by Dombrowski & Holmes or Land & Lakes. The drums are managed in the Outdoor Storage Area (SWMU 1), and are disposed of within 90 days of the start of accumulation. Waste oil is skimmed off the washer tank surface and drummed for disposal by STA Decanting in Hammond, Indiana. The drums are managed in the Outdoor Drum Storage Area (SWMU 1). The iron phosphate/phosphoric acid wastewater is collected in a sump and pumped into 2 in-series treatment tanks (SWMU 4). Wastewater treatment sludge (F018) settles out in the tanks, and is drummed and disposed of by STA Decanting. The tanks are monitored continually for pH, and a pump triggers injection of sulfuric acid to neutralize any alkalinity. The wastewater, once treated, is discharged to the municipal sewer system.

Once the parts are washed they pass through a dry-off oven. The batch department uses a gas-fired open-top vapor degreaser containing trichloroethylene (TCE) to clean parts prior to spraying. When the TCE becomes contaminated with more than 30% oil, it is removed and distilled in the Paint Solvent Still (SWMU 5), the still bottoms being transported off-site by EWR, Coal City, IL. After distillation, the TCE is recycled on-site by Solvent Systems International (SSI). Periodically, SSI bring a mobile recycling/reclaiming unit on site and the process takes place in one of the parking lots. Drums of both product and contaminated TCE are managed in the Outdoor Drum Storage Area (SWMU 1).

On the disc line, the parts pass through 3 conventional (wet) spray booths, then through a powder spray booth. On the spray line, they pass through 3 wet spray booths. On the dip line, the parts are dipped into a paint tank and then pass through 2 spray booths and a powder booth. The powder line consists of a single powder booth. The walls of all the booths are covered with fiberglass baffles to trap airborne paint, and the floors are covered with cardboard in the wet spray booths and plastic sheeting in the powder booths. The baffles are compacted into bales and disposed of daily, along with the floor coverings, in the Special Waste Dumpster (SWMU 2). Excess paint that has accumulated on racks and hooks in the spray booths is removed by burning in an 800°F controlled-pyrolysis Burn-off

Oven (SWMU 3) to incinerate paint resins and volatiles. The resulting non-hazardous ash is swept up and disposed of in the Special Waste Dumpster (SWMU 2). Less than 10 lbs. of ash is produced per day. Excess powder paint is collected in a separator or dust collector (Photo 11) and disposed of in the Special Waste Dumpster (SWMU 2). The main hazardous waste stream from the spray booths is waste paint solvent (F003/F005) produced primarily by the flushing of paint lines when changing colors. This waste is collected in drums which are stored in the Outdoor Drum Storage Area (SWMU 1) prior to being processed on site in the Paint Solvent Still (SWMU 5). In addition the solvent is recycled by SSI as outlined above for the TCE waste stream. The resulting clean solvent is reused; the hazardous waste stream from the solvent still is the still bottoms, which are disposed of off-site by EWR. A sloped concrete floor with a drain leading to a 5,000-gallon Underground Storage Tank below the North Parking Lot (AOC 2) acts as secondary containment for the area of the solvent still. Raw material solvent is stored in two-1000 gallon underground storage tanks outside the northwest corner of the facility buildings (AOC 1). These solvent storage tanks are replenished every 4 to 5 months. Non-hazardous spray booth sludge is drummed and disposed of off-site by Land & Lakes.

In all the painting departments, painted parts pass through a bake oven to fix the paint coating. There is some waste generated in the form of baked paint, which is disposed of in the Special Waste Dumpster (SWMU 2).

Two hot strip tanks are used to remove coatings from metal parts. Potassium hydroxide (KOH - D002) is used for steel parts, and a solution of diethanolamine and monoethanolamine (DEA/MEA) is used for aluminum parts. Waste from the KOH tank is centrifuged to remove sludge and the remainder is fed into the Wastewater Treatment Tanks (SWMU 4). DEA/MEA waste is drummed and placed in the Outdoor Drum Storage area (SWMU 1) before disposal. The KOH tank has a concrete floor covered by a metal grating as secondary containment, carrying spillage to the Wastewater Treatment Tanks (SWMU 4). The total rate of generation of hot strip tank KOH sludge is about 1 to 2 drums per year. Until 1987, methylene chloride was used as a cold stripper for aluminum. Waste was drummed and transported off-site for disposal.

All of the ovens and the degreaser are gas-powered. They were once oil-fired, and heating oil was stored in two Underground Storage Tanks under the North Parking Lot (AOC 2). These tanks have capacities of 5,000 and 20,000 gallons. The larger of the two still contains between 7,000 and 8,000 gallons of oil; the smaller is empty and is used as an emergency overflow tank for the paint vault.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Source</u>	<u>Primary Management Unit</u>
Kerosene-based solvent/lacquer thinner	Pre-painting parts cleaner	SWMU 1
Skim oil sludge/F018	Parts washer	SWMU 1
Wastewater containing phosphoric acid & iron phosphate	Parts washer	SWMU 4
Washer sludge	Parts washer	SWMU 1
Wastewater treatment sludge/F018	Settling tank/wastewater treatment tank	SWMU 1
Dirty trichloroethylene/F001	Vapor degreaser	SWMU 5
Trichloroethylene still bottoms/F001	Solvent still	SWMU 1
Paint coated paper, cardboard & plastic	Spray booths/conveyor belts	SWMU 2
Paint-coated fiberglass filters	Spray booths	SWMU 2
Excess paint solids	Spray booths	SWMU 3
Oven ash	Burn-off oven	SWMU 2
Excess powder paint	Spray booths	SWMU 2
Paint-contaminated solvents/F003/F005	Spray booths	SWMU 5
Paint solvent still bottoms/F003/F005: xylene, naphtha [EMSOL 150] (formerly toluene)	Solvent still	SWMU 1
Spray booth sludge (non-hazardous)	Spray booths	SWMU 1
Baked dry paint	Bake oven	SWMU 2
Waste potassium hydroxide/D002	Hot steel stripper	SWMU 4
Diethanolamine/monoethanolamine/F017	Hot aluminum stripper	SWMU 1
Methylene chloride/F001/F017 ¹	Cold aluminum stripper	SWMU 1

¹ Use of methylene chloride was discontinued in 1987

RELEASE HISTORY

During the VSI, evidence of releases from two areas was observed. The asphalt floor of the Outdoor Drum Storage Area (SWMU 1) had white staining and was pitted and cracked in places (Photo 7). This may indicate releases of small quantities of material from the drums stored there. However, it appeared that such releases were contained in the immediate vicinity and thus posed no threat to the environment. In addition, the wall and ground adjacent to the Outside Paint Solvent Fill Ports (AOC 1) was stained, indicating small spills during filling of the tanks. Again, these releases appear to have been well contained.

Apart from these minor observations, no evidence of fire, explosion, or release of hazardous constituents has been documented at the Acme facility.

REGULATORY HISTORY

Acme filed a Notification of Hazardous Waste Activity on September 26, 1980 (Acme, 1980a) and a RCRA Part A permit application on November 17, 1980, designating the company as a generator and a treatment, storage and disposal (TSD) facility (Acme, 1980b). Wastes with RCRA codes F001, F003, F005, F017 and F018 were registered as being generated at the facility. Two process codes were filed on the application: S01 for the drum storage area (SWMU 1); and T01 for the Wastewater Treatment Tanks (SWMU 4). An annual total of 65,400 pounds of hazardous wastes were estimated as having been generated.

On January 29, 1981, Brad Benning of the Illinois Environmental Protection Agency (IEPA) conducted an inspection at the Acme facility, and a report was subsequently received by the Division of Land Pollution Control on March 2, 1981 (IEPA, 1981). As a result, on May 19, 1981 EPA Region 5 sent a Complaint and Findings of Violation notice to Acme citing 8 violations of RCRA (EPA, 1981a). The facility had failed to: 1) keep records of personnel training; 2) have a written emergency contingency plan available on site; 3) keep records or written guidelines for operator inspection; 4) post "Danger - Unauthorized Personnel Keep Out" signs at the entrance to any active portion of the facility; 5) develop a written schedule for inspection of all monitoring, safety and operating equipment on site; 6) keep a log or summary for such inspections; 7) take precautions to prevent accidental ignition or reaction of ignitable or reactive wastes; and 8) appoint an Emergency Coordinator. On June 18, 1981 Dennis Walters, a vice-president of Acme, wrote to EPA to notify them that these violations had been

rectified (Acme, 1981). A Consent Agreement and Final Order closing out the matter was signed by Walters on July 24, 1981, and by an EPA official on August 4, 1981 (EPA, 1981b).

On August 1, 1983, Acme requested withdrawal of its Part A application as a facility storing hazardous wastes, as its waste haulers were removing the facility's wastes less than 90 days after generation. On November 9 of that year Dennis Walters acknowledged receipt of a letter from IEPA informing the company that its request contained insufficient information (Acme, 1983a). A December 15 letter stated that Acme did not see the need for a closure plan as the frequency of pick-up of waste had merely been increased to comply with the 90-day limit (Acme, 1983b). On February 9, 1984, the submitted closure plans were rejected by IEPA due to lack of detail on closure and disposal procedures (IEPA, 1984a). A modified closure plan was received by IEPA on October 15, 1984 (Acme, 1984). Acme pointed out that its F018 waste (skim oil sludge and wastewater treatment sludge) was delisted as a hazardous waste by EPA in the fall of 1980, and thus the closure plan only applied to the Outdoor Drum Storage Area (SWMU 1). At the time of writing of the closure plan only D001 paint waste was being stored. An Illinois supplemental special waste stream disposal permit had been applied for, making arrangements to dispose of the remaining waste through EWR, Coal City, IL. On December 7, 1984 the closure information was approved by IEPA (IEPA, 1984b), and a March 25, 1985 inspection showed that closure had been completed in accordance with the approved plan (IEPA, 1985). Since that date, Acme has been regulated solely as a generator of hazardous waste.

On August 22, 1986 IEPA conducted a Generator Inspection (IEPA, 1986a) and found no evidence of fire, explosion or release of hazardous waste constituents. Solvent was being sent to Avganic Industries, Inc. for recycling, and trichloroethylene to Safety-Kleen. Caustic hot stripper (KOH) was being generated in small quantities as was cold stripper sludge containing methylene chloride. IEPA notified Acme in an October 17, 1986 letter that the company was in violation of certain RCRA recordkeeping requirements pertaining to employee training, job descriptions and job titles (IEPA, 1986b). On December 31, 1986 Acme responded with the necessary documentation (Acme, 1986), and IEPA notified the company on February 23, 1987 that its violations were considered resolved (IEPA, 1987).

There are no records regarding NPDES permits or CERCLA activity at this site. Acme has had 4 IEPA air permits for internal air pollution control devices (Nos. 75040125, 76110091, 79090029 and 77020005). These permits were operated under the volatile organic compounds (VOC) internal offsets rule, and were for the 5 coating lines, the open-top Vapor Degreaser and the 2 gas-fired air make-up units. These expired on May 17, 1990, and a July 31, 1990, letter from IEPA states that the application

for renewal of these permits was denied on June 14, 1990 (IEPA, 1990). The reason for this denial is not stated, but the letter notified Acme of the penalties for continuing to operate without these permits. The permits were renewed on February 6, 1991, combined into one permit, No. 75040125, which expires January 30, 1993. A separate air permit for the Burn-off Oven (SWMU 3), No. 82010030, expires February 17, 1992. No correspondence is on file past July 1990 concerning air permits; thus it is not known whether the four permits were eventually renewed.

On April 2, 1984, IEPA issued an order for violation of emissions standards for volatile organic material from the open-top degreaser (IEPA, 1984c). In addition, daily emission records were not being kept, as required by the permit. A program to bring the site into compliance was instituted, and a 1988 inspection found Acme to be in full compliance with the Clean Air Act (IEPA, 1988).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, floodplain and surface water, geology and soils, and ground water in the vicinity of the Acme facility.

2.6.1 Climate

The Acme Finishing Co., Inc. site is situated in Elk Grove Village in Cook County, Illinois. It is approximately 4.5 miles northwest of O'Hare International Airport, the location of the nearest U.S. National Weather Service office. With no significant topographical barriers to airmass flow, the climate in the area is typically continental with cold winters, warm summers, and frequent short-period fluctuations in temperature, humidity, cloudiness and wind direction (Ruffner, 1985). The average annual daily temperature is 49.2°F, while the lowest average monthly minimum temperature of 12.4°F occurs in January and the highest average monthly maximum temperature of 83.3°F occurs in July. The prevailing wind direction is west-southwest, and the average wind speed is 10 miles per hour. Average annual precipitation, as a water equivalent, is 33.34 inches. Average annual net precipitation is 3.34 inches. In winter, about one-half of the precipitation (10 percent of the annual total) falls as snow. During the fall, winter and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer, rainfall is often locally heavy and variable. The 1-year, 24-hour maximum rainfall recorded in the area over a 29-year period is 4.6 inches (Ruffner and Bair, 1985).

2.6.2

Flood Plain and Surface Water

The facility, at an approximate elevation of 685 feet above mean sea level, is situated on the eastern slope of a roughly north-south ridge that directs surface runoff via intermittent streams (Higgins Creek and Willow Creek, both about a half-mile from the site) to the Des Plaines River 6 miles to the east (USGS, 1981). The site locale is classified as a Zone C floodplain area, that is, an area of minimal flooding outside the 500-year flood limit (FEMA, 1982).

2.6.3

Geology and Soil

Surface features in the Chicago area are largely the result of glaciation and almost completely cover the underlying bedrock surface (Willman, 1971). The facility is underlain by two soil units - the Ashkum silty clay loam and the Beecher silt loam. The former is a poorly drained soil which is often artificially drained. Where undrained or where drainage systems have been damaged by construction, the water table is at a depth of 1 foot or less during wet seasons. Thus, this soil occasionally floods for brief periods during spring. Water and air movement through the Ashkum silty clay loam is moderately slow, and its available water capacity is high. Organic matter content is high. This soil's relatively high clay content makes it sticky when wet and hard and cloddy when dry, and gives it poor potential for most urban uses. The Beecher silt loam is a nearly level, somewhat poorly drained soil. When not artificially drained, a water table is at a depth of 1 to 3 feet during wet seasons. Water and air movement through this soil is slow, while available water capacity is moderate. Organic matter content is moderate. This soil, like the Ashkum silty clay loam, has a poor potential for urban uses (USDA, 1979).

Soils in the Chicago area have developed over the past 13,500 years through the weathering of the immediately underlying glacial deposits left behind, for the most part, by retreating Wisconsin-age glaciers. In the vicinity of the site, these glacial deposits take the form of a gray, clayey till containing pebble and smaller-sized black shale particles. Approximately 100 feet of till overlie the uppermost bedrock unit of Silurian age. Formations in the Chicago area of Silurian age are almost entirely dolomite, whose composition ranges from extremely argillaceous, silty and cherty to exceptionally pure. In the site vicinity, it is about 200 feet thick. Beneath the Silurian dolomite are successively older rocks of Ordovician and Cambrian age. Within each of these two systems are distinctive sandstone formations which serve as major aquifer systems in the Chicago area. The base of the Cambrian is in contact with the crystalline pre-Cambrian basement at an inferred depth of 3,800 feet (Willman, 1971).

There are two major bedrock structures in the vicinity of the site -- the Kankakee Arch and the Des Plaines Disturbance. The Chicago area lies on the crest of this broad, gently sloping Arch, and bedrock strata underlying the site have a general eastward dip resulting from the eastward plunge of the Arch. The Des Plaines Disturbance, as indicated by bedrock well log interpretation, is a roughly circular area about 5 1/2 miles in diameter. The site is located a short distance to the southwest of this structure. While bedrock units within the Des Plaines Disturbance area are intensely faulted with vertical displacements up to 600 feet, wells drilled into the surrounding Silurian dolomite have not revealed any faults. There is no surface manifestation of the Des Plaines Disturbance because the bedrock is buried under 75 feet to 200 feet of glacial drift (Willman, 1971). Consequently, there may be faulting of the bedrock in the site vicinity which has not yet been revealed by well sampling.

2.6.4 Ground Water

Ground water is obtained from four major aquifer systems in northeastern Illinois -- the glacial drift system, the shallow bedrock system, and two deep bedrock systems. They are distinguished by their hydrologic properties and recharge source areas (Hughes et al., 1966). In northwestern Cook County, ground water possibilities in the glacial drift system are best in deposits of sand and fine-to-coarse gravel which are up to 100 feet thick and occur mainly in the lower half of the drift (Bergstrom et al., 1955). The shallow bedrock aquifer system in the vicinity of the site underlies the glacial drift system and comprises the Silurian dolomite formations and underlying upper-Ordovician shales. The upper boundary of this system is the top of the bedrock, and the lower boundary is the top of a sequence of formations of middle-Ordovician age called the Galena-Platteville Dolomite. Water from this aquifer is obtained from fractures and solution openings in the Silurian dolomite beds. As a result, individual well yields vary widely, depending upon the water volume present in the drilled openings. Recharge is attained by percolation of local precipitation through the overlying glacial drift and/or permeable materials within the drift sequence itself (Hughes et al., 1966). The shallow bedrock system can serve as a source for domestic, industrial and municipal water supplies. Domestic wells usually obtain water from the upper 15 feet to 75 feet of the dolomite, while wells serving municipalities and industries generally penetrate 50 feet to 250 feet into the dolomite (Bergstrom et al., 1955).

The deep bedrock aquifer systems include the Cambrian-Ordovician aquifer system and the Mt. Simon aquifer system. The former comprises the Glenwood and St. Peter Formations of the middle Ordovician series and the Ironton and Galesville Sandstone Formations of the late Cambrian. The top of the Cambrian-Ordovician aquifer is at the top of or within the Galena-Platteville Dolomite, which serves as the lower boundary for the shallow bedrock aquifer system. In the site locale, the contact

between the Galena-Platteville Formations and the Glenwood Formation occurs at a depth of about 800 feet below the ground surface. The bottom of the Cambrian-Ordovician aquifer system is located in the impermeable shales and dolomites of the upper and middle parts of the Cambrian Eau Claire Formation, at a depth of about 1,400 feet below the ground surface. Thus, this aquifer system spans a thickness of 600 feet (Hughes et al., 1966).

Within the Cambrian-Ordovician aquifer system, the Glenwood-St. Peter sandstone unit is widely utilized as an aquifer where water requirements are less than 200 gallons per minute (gpm). This unit has a permeability of approximately 15 gallons per day per square foot (gpd/sq.ft.). The Ironton-Galesville sandstone unit is the major producing unit in the Cambrian-Ordovician aquifer because it has the most consistent permeability (35 gpd/sq.ft.) and thickness (200 ft.) of the aquifers in northeastern Illinois (Hughes et al., 1966).

Recharge to the Cambrian-Ordovician aquifer system is mostly from western McHenry, Kane and Kendall counties where the rocks crop out at the surface or lie immediately below the glacial drift. Thus the direction of ground water flow is from west to east. Additional recharge occurs directly from leakage of precipitation downward through the shallow bedrock aquifer system.

The second deep bedrock aquifer system - the Mt. Simon aquifer - is bounded above by the relatively impermeable shales and dolomites of the upper and middle parts of the Eau Claire Formation and below by the crystalline pre-Cambrian basement. With the Eau Claire Formation units functioning as an aquitard, water in the Mt. Simon aquifer is about 1,750 feet beneath the ground surface. Although the Mt. Simon Sandstone is nearly 2,000 feet thick, only the uppermost 275 feet of sandstone yield potable water because below that depth the water is too highly mineralized for most purposes (Hughes et al., 1966). The average permeability of the Mt. Simon aquifer system is approximately 16 gpd/sq. ft. (Hughes et al., 1966) and recharge is largely from the outcrop region of Cambrian rocks in central southern Wisconsin (Willman et al., 1971).

2.7 RECEPTORS

The facility is located in an industrial area with the nearest residential areas located 1.5 miles to the east, 1.25 miles to the north, 2 miles to the south and 0.75 miles to the west. Surface drainage of the area is toward the east-southeast into Higgins and Willow Creeks, both about a half-mile from the facility. These creeks join and flow into the Des Plaines River at a distance of 6 miles from the site. Access to the facility is unrestricted, other than that the buildings are locked during non-business hours.

Hazardous wastes are stored in a fenced-in area in the southwest corner of the Acme parking lot (SWMU 1). Public contact with contaminated soil at the site is unlikely because of limited and controlled access to the area. Nearby commercial facilities are also equally unlikely exposure points.

Elk Grove Village receives its water from the municipal water system the source for which is Lake Michigan some 8 miles to the east. Thus the community is dependent upon water from ground water wells. There are no ground water wells within 2 miles of the facility. The nearest surface water is Higgins Creek, a half-mile to the northeast. The possibility of human ingestion of contaminated water from the site is minimal. No sensitive environments or habitats of endangered species are located within 2 miles of the site.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 5 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and RAI observations.

SWMU 1 Outdoor Drum Storage Area

Unit Description: This area is a chain-link-fenced, 54-ft.-by-38-ft., asphalt-paved area in the northwest section of the facility (Photos 1-8; Figure 2). This is the storage area listed on the RCRA Part A Permit Application. Access during daytime business hours is unrestricted. At all other times, the gate is locked. The area stores hazardous and nonhazardous wastes, in addition to raw materials. Hazardous wastes are stored (for less than 90 days) on the western side of the storage area, and include drums of paint-solvent still bottoms, dirty trichloroethylene and trichloroethylene still bottoms, and waste hot stripper sludge (potassium hydroxide; diethanolamine/monoethanolamine). Nonhazardous wastes include drums of skim oil from parts cleaning. Raw materials include drums of paint, paint solvent, stripper chemicals, and cylinders of propane gas. The precise count of product and waste drums fluctuates. At the time of the VSI, there were 10 drums of hazardous waste, 5 drums of nonhazardous waste, and approximately 100 drums of product.

Date of Startup: This unit began operation in 1976.

Date of Closure: This unit was closed according to an IEPA-approved RCRA closure plan in 1985. It is currently operating as a less than 90-day hazardous waste storage area.

Wastes Managed:	Paint-solvent still bottoms	F003/F005
	Dirty trichloroethylene	F001
	Trichloroethylene still bottoms	F001
	Hot stripper (potassium hydroxide, diethanolamine/monoethanolamine)	D002/F017
	Skim oil sludge	F018

Release Controls: Drummed hazardous wastes are stored on wooden pallets above the asphalt flooring along the western perimeter of the storage area. No other containment is in place. Some drums of product are stored directly on the asphalt floor.

History of Release: During the VSI, the asphalt floor was observed to be pitted, cracked, and stained white in some areas. This may be due to small releases of material from drums (Section 2.4). Other than this, there has been no documented release from this unit.

Observations: The asphalt paving in the storage area shows evidence of age in the form of cracks and pits (Photos 7 and 8), and there is evidence of small releases, as outlined above.

SWMU 2 Special Waste Dumpster

Unit Description: This unit is a 30-cubic yard, plastic-lined steel dumpster for disposal of nonhazardous special waste (Photo 9; Figure 2). All such waste originates from painting operations and include paint booth air filters; baked dry-powder paint; and paint-coated paper, cardboard, and plastic. The dumpster is located parallel to and 15 feet north of the north perimeter of SWMU 1.

Date of Startup: This unit began operation in the fall of 1988.

Date of Closure: Currently operating.

Wastes Managed: The dumpster is used for nonhazardous paint operation wastes including baked dry-powder paint; paint booth air filters; and paint-coated paper, cardboard, and plastic.

Release Controls: The steel dumpster is lined with plastic.

History of Release: There has been no documented release from this unit.

Observations: No evidence of release was observed during the VSI. Although the top of the dumpster is open, the plastic liner contains any precipitation leachate, and the mass of individual disposed items is great enough to prevent airborne dispersal.

SWMU 3 Burn-off Oven

Unit Description: This is a 6-ft. wide by 9-ft. long by 9-ft. high unit east of the strip area (Photo 14; Figure 2). Paint which has accumulated on racks and hooks is removed by breaking down the paint resins and incinerating the volatiles in a controlled-pyrolysis oven. Excess paint gathered from application areas is also incinerated. Oven ash is swept up and put in the Special Waste Dumpster (SWMU 2). The oven burner operates at 800°F and the afterburner at 1,400°F. The oven is used about twice every shift.

Date of Startup: This unit began operation in the Spring of 1982.

Date of Closure: Currently operating.

Wastes Managed: Excess paint solids are burned in the oven. This unit generates nonhazardous ash which is disposed of in the Special Waste Dumpster (SWMU 2).

Release Controls: During operation, the oven is inaccessible. Ash is discarded at the completion of each burning cycle. Emissions from the unit are monitored and regulated under an IEPA air permit (No. 82010030).

History of Release: There has been no documented release from this unit.

Observations: No evidence of release was observed during the VSI.

SWMU 4 Wastewater Treatment Tanks

Unit Description: This unit consists of two 4-ft. by 8-ft. by 4-ft. high steel tanks covering an 8-ft. by 8-ft. section in the northeast area of the plant (Photo 12; Figure 2). The system was incorrectly filed under code T01 on the RCRA Part A application; based on the files obtained by RAI, a correction to the application has not yet

been made. The tanks are connected in series to process up to 600 gpd of production wastewater. The wastewater is brought via pipes into the treatment tanks. Particulates settle out and the pH is automatically adjusted, as necessary, through addition of sulfuric acid before the wastewater enters the sanitary sewer system.

Date of Startup: This unit began operation in 1976.

Date of Closure: Currently operating.

Wastes Managed: Originating at the steel parts strip tank, potassium hydroxide (D002) is introduced to the plant wastewater stream after centrifugation isolates tank sludge. This sludge is drummed, stored in the Outdoor Drum Storage Area (SWMU 1) and disposed of by STA Decanting. In addition, this unit manages wastes introduced at the parts washer tanks on the disc, spray, and dip lines; namely, iron phosphate and phosphoric acid (F018).

Release Controls: No secondary containment system was observed. A drain to the sanitary sewer system is located near the northwest corner of the tanks.

History of Release: There has been no documented release from this unit.

Observations: No evidence of a release was observed during the VSL. The unit is in good condition.

SWMU 5 **Paint Solvent Still**

Unit Description: This is a process system using paint-contaminated solvents as input to a distillation unit that yields reusable solvents and still bottoms. The unit is located in the paint vault which is along the east wall in the north half of the plant. Contaminated solvent is manually added to a drum as it is generated during operations. About once per day, this liquid is pumped from the drum to the still, processing approximately 20 gallons at a time. Still bottoms are drummed and are produced at a rate of approximately one drum every two weeks.

Date of Startup: The startup date for this unit is unknown.

Date of Closure: Currently operating.

Wastes Managed: Paint solvent still bottoms include paint solids and paint solvents (xylene & EMSOL150, a naphtha-based solvent - F003/F005). Toluene (F003/F005) was formerly used as a paint solvent. In addition, TCE is distilled in this unit, and still bottoms are generated as a result.

Release Controls: The still is located in the southeast corner of the paint vault. The vault is a concrete, fully-enclosed structure with a ventilation system. The vault floor is unbroken concrete sloped to the northeast corner where a floor drain leads to a 5,000-gallon Underground Storage Tank beneath the North Parking lot (AOC 2). This UST functions solely as an overflow receptacle in the event of a catastrophic failure of all drums in the vault. It is not currently used for any other purpose. Only the paint foreman has access to the vault.

History of Release: There has been no documented release from this unit.

Observations: No evidence of release was observed during the VSI. Warning notices are posted outside the vault, and drums inside the vault are labelled to indicate contents. The floor of the vault appeared intact, and the still is in good condition.

4.0 AREAS OF CONCERN

RAI identified 2 AOCs during the PA/VSI. They are discussed below.

AOC 1 Outside Paint Solvent Fill Ports and USTs

Solvent for use in the stripping process is delivered by tanker truck and stored in two 1,000-gallon underground storage tanks (USTs) which are located outside the northwest corner of the site. Tanker truck hoses are attached directly to the UST fill ports, minimizing the potential for spilling of product. This system is included as an AOC with a moderate potential for release to soil and ground water due to two factors: (1) the possibility exists for overflow to the ground from the mouths of the fill ports and, (2) underground storage tanks are not easily monitored and are subject to corrosion. During the VSI, Staining was noticed on the wall and ground surrounding the fill ports (Section 2.4; Photo 1). This is most likely due to spillage during filling of the tanks, but the releases were contained, and there was no threat to the environment. The USTs are currently in Phase I of testing for actual or potential releases. Nova Environmental is conducting the tests.

AOC 2 Underground Storage Tanks under North Parking Lot

These tanks were originally used to store heating oil to power the ovens and the vapor degreaser. The USTs have capacities of 20,000 and 5,000 gallons. At the time of the VSI, the larger tank contained 7,000 to 8,000 gallons of heating oil. The smaller tank is used as secondary containment for overflow from the Paint Solvent Still area (SWMU 5). A sloped concrete floor in this area leads to a drain connected to the UST. These tanks are included as an AOC with moderate potential for release to soil and ground water because underground storage tanks are not easily monitored and are subject to corrosion.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

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The PA/VSI identified 5 SWMUs and 2 AOCs at the Acme facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. AOCs are discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 identifies the SWMUs and AOCs at the Acme facility and suggested further actions.

SWMU 1 Outdoor Drum Storage Area

Conclusions: This area has no secondary containment, and the concrete floor is cracked and pitted (Photo 7). For these reasons, the potential for release to ground water, surface water, air, or soil is moderate.

Recommendations: Conduct soil sampling beneath the stained areas of the asphalt. Provide adequate secondary containment, preferably in the form of a berm around the area.

SWMU 2 Special Waste Dumpster

Conclusions: This dumpster stores nonhazardous wastes and is lined with plastic. Due to this sound secondary containment the potential for release to ground water, surface water, air, or soil is low.

Recommendations: No further action is recommended at this time.

SWMU 3 Burn-off Oven

Conclusions: This unit generates nonhazardous ash which is disposed of in the Special Waste Dumpster (SWMU 2). The oven is entirely sealed during operation and is located inside the facility building. Therefore, the potential for release to ground water, surface water, air or soil is low.

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TABLE 3

SWMU and AOC SUMMARY

<u>SWMU</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Outdoor Drum Storage Area	1976 to present	Minor release from drums (Photo 7) but not to the environment.	Conduct soil sampling beneath stained asphalt. Provide adequate secondary containment.
2. Special Waste Dumpster	Fall 1988 to present	None	No further action is recommended at this time.
3. Burn-off Oven	Spring 1982 to present	None	No further action is recommended at this time.
4. Wastewater Treatment Tanks	1976 to present	None	No further action is recommended at this time.
5. Paint Solvent Still	Unknown to present	None	No further action is recommended at this time.

<u>AOC</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Outside Paint Solvent Fill Ports and USTs	Unknown to present	Minor releases from fill ports (Photo 1) but not to the environment.	No further action is recommended at at this time, pending testing results.
2. Underground Storage Tanks under North Parking Lot	Unknown to present	None	Under the proper authority, tank testing should be conducted.

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Recommendations: No further action is recommended at this time.

SWMU 4 Wastewater Treatment Tanks

Conclusions: The wastes treated by this unit are monitored for pH and adjusted automatically before being discharged into the sanitary sewer system. There is no secondary containment but the tanks are indoors and in good condition. Therefore the potential for release to ground water, surface water, air, or soil is considered low.

Recommendations: No further action is recommended at this time.

SWMU 5 Paint Solvent Still

Conclusions: This unit is located in the paint vault which is a fully enclosed concrete structure with a ventilation system. A drain in the sloped concrete floor leads to a 5,000-gallon underground storage tank (AOC 2) used as secondary containment in the case of a release of wastes from the still. The potential for release to ground water, surface water, air or soil is considered low as the UST provides adequate secondary containment for the vault area.

Recommendations: No further action is recommended at this time.

AOC 1 Outside Paint Solvent Fill Ports and USTs

Conclusions: Solvents are transferred to the USTs by attaching tanker hoses directly to the fill ports. Photo 1 indicates that spills of product due to overflow from the fill port mouths may occur. In addition, the underground tanks are not easily monitored and may be corroded. For these reasons the potential for release to ground water and soil is moderate, while the release potential to air and surface water is low. At the time of inspection the USTs were in Phase I of testing to determine any actual or potential leakage. The testing was being performed by Nova Environmental.

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Recommendations: No further action is recommended at this time, pending the results of the tank testing.

AOC 2 Underground Storage Tanks under North Parking Lot

Conclusions: At the time of the VSI, the 20,000-gallon tank contained 7,000 to 8,000 gallons of heating oil. The 5,000-gallon tank may be empty but is currently employed as secondary containment for the Paint Solvent Still (SWMU 5). The potential for release to ground water and soil is moderate as the USTs are not easily monitored and are subject to corrosion. Release potential to air and surface water is low.

Recommendations: Under the proper authority, tank testing should be conducted to determine actual or potential leakage.

REFERENCES

- Acme Finishing Company, Inc. (Acme), 1980a. Notification of Hazardous Waste Activity, September 26.
- Acme, 1980b. RCRA Part A Permit Application, November 17.
- Acme, 1981. Letter from Dennis Walters to Sandra Gardebring, EPA, June 18.
- Acme, 1983a. Letter from Dennis Walters addressed to RCRA Activities, Region V, November 9.
- Acme, 1983b. Letter from Dennis Walters to Lawrence Eastep, IEPA, December 15.
- Acme, 1984. Letter from Dennis Walters to Lawrence Eastep, IEPA, enclosing closure plan; received by IEPA October 15.
- Acme, 1986. Letter from Dennis Walters to Mark Haney of IEPA, enclosing information necessary to resolve RCRA violations, December 31.
- Bergstrom, R.E., J.W. Foster, L.F. Selkregg, and W.A. Pryor, 1955. "Groundwater Possibilities in Northeastern Illinois". Illinois State Geological Survey Circular 198; Urbana, Illinois.
- Environmental Protection Agency (EPA), 1981a. Letter from Sandra S. Gardebring, EPA to Dennis Walters of Acme enclosing Complaint and Findings of Violation, May 19.
- EPA, 1981b. Fully executed Consent Agreement and Final Order for RCRA violations, August 4.
- Federal Emergency Management Agency (FEMA), 1982. National Flood Insurance Program, Village of Elk Grove, Illinois, Cook and DuPage Counties. Community - panel numbers 170088 0001-0015. Map revised: May 14.
- Hughes, G.M., P. Kraatz, and R.A. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois". Illinois State Geological Survey Circular 406; Urbana, Illinois.
- Illinois Environmental Protection Agency (IEPA), 1981. RCRA Observation Report and Inspection Reports for Treatment, Storage and Disposal and Generator Facilities. Inspection conducted by Brad Benning, January 29; reports received by Division of Land Pollution Control March 2.
- IEPA, 1984a. Letter from Lawrence W. Eastep to Dennis Walters of Acme outlining deficiencies in closure plan, February 9.
- IEPA, 1984b. Letter from Lawrence W. Eastep to Dennis Walters of Acme approving closure plan, December 7.
- IEPA, 1984c. Letter from David Kee, Director, Air Management Division to Lawrence E. Walters, Acme President enclosing Notice of Violations, April 2.
- IEPA, 1985. Memorandum from Chuck Gruntman, IEPA to Division File regarding Closure Inspection, March 25.
- IEPA, 1986a. RCRA Inspection Report for Generator Facilities, August 22.

- IEPA, 1986b. Letter from Mark A. Haney to Dennis Walters of Acme, regarding RCRA violations, October 17.
- IEPA, 1987. Letter from Harry A. Chappel to Dennis Walter, Acme, February 23.
- IEPA, 1988. Air Inspection Report, April 20.
- IEPA, 1990. Letter from Miles Zamco, Division of Air Pollution Control to Dennis Walters, Acme, July 31.
- Ruffner, J. A. and Frank E. Bair, eds., 1985. Weather of U.S. Cities, vol. 1; Gale Research Co., Detroit, Michigan.
- Ruffner, J. A., ed., 1985. Climates of the States, vol. 1; Gale Research Co., Detroit, Michigan.
- U.S. Department of Agriculture (USDA), 1979. "Soil Survey of DuPage and Part of Cook Counties, Illinois". Illinois Agricultural Experiment Station Report No. 108, 1979.
- U.S. Geological Survey (USGS), 1981. Arlington Heights Quadrangle, Illinois - Cook County, 7.5-minute topographic series.
- Willman, H.B., 1971. "Summary of the Geology of the Chicago Area". Illinois State Geological Survey Circular 460. Urbana, Illinois.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER ILD 005 087 812

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Acme Finishing Company, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 1595 Oakton Street			
03 CITY Elk Grove Village	04 STATE IL	05 ZIP CODE 60007	06 COUNTY Cook	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 42 01 18.N		LONGITUDE 087 57 42.W			
10 DIRECTIONS TO SITE (Starting from nearest public road) The site is on the south side of Oakton Street, a four-lane road.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Acme Finishing Co. Inc.		02 STREET (Business, mailing, residential) 1595 Oakton Street			
03 CITY Elk Grove Village	04 STATE IL	05 ZIP CODE 60007	06 TELEPHONE NUMBER (708) 640-7890		
07 OPERATOR (if known and different from owner) Same As Owner		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL (Agency name) <input type="checkbox"/> F. OTHER _____ <input type="checkbox"/> G. UNKNOWN (Specify)					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 09 / 26 / 80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: / / <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

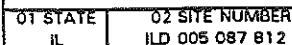
01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 04 / 11 / 91 <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): Resource Applications, Inc.			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1976 Present BEGINNING YEAR ENDING YEAR <input type="checkbox"/> UNKNOWN			
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Xylene, naphtha, trichloroethylene, diethanolamine/monoethanolamine, potassium hydroxide, waste oil, heating oil, paint, phosphoric acid, iron phosphate.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The facility is located in an industrial/residential area. Sound secondary containment for the outdoor drum storage area would prevent a release from affecting the environment or local populations.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448		
04 PERSON RESPONSIBLE FOR ASSESSMENT William Dytrych	05 AGENCY	06 ORGANIZATION Resource Applications, Inc.	07 TELEPHONE NUMBER (312) 332-2230	08 DATE 08 / 14 / 91 MONTH DAY YEAR	



☐ A. TOXIC
☐ B. CORROSIVE
☐ C. RADIOACTIVE
☐ D. PERSISTENT
☐ E. SOLUBLE
☐ F. INFECTIOUS
☒ G. FLAMMABLE
☐ H. IGNITABLE
☒ I. HIGHLY VOLATILE
☐ J. EXPLOSIVE
☐ K. REACTIVE
☐ L. INCOMPATIBLE
☐ M. NOT APPLICABLE

EPA FORM 2070-12(7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 005 087 812
----------------	-----------------------------------

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 <input type="checkbox"/> A. GROUNDWATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION			
SWMU 1 has moderate potential for release to ground water, due to lack of secondary containment. AOCs 1 & 2 have a moderate potential for release to ground water due to the fact that they are underground storage tanks with no continuous monitoring system installed. All other units have low potential.			

01 <input type="checkbox"/> B. SURFACE WATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>> 35,000</u> 04 NARRATIVE DESCRIPTION			
SWMU 1 has moderate potential for release to surface water, due to lack of secondary containment. All other units have low potential.			

01 <input type="checkbox"/> C. CONTAMINATION OF AIR	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>> 35,000</u> 04 NARRATIVE DESCRIPTION			
SWMU 1 has moderate potential for release to air, due to the fact that volatiles are stored. All other units have low potential.			

01 <input type="checkbox"/> D. FIRE/EXPLOSIVE CONDITIONS	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION			
None identified.			

01 <input type="checkbox"/> E. DIRECT CONTACT	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: <u>> 35,000</u> 04 NARRATIVE DESCRIPTION			
Low potential for direct contact. All operations and storage areas are locked after hours.			

01 <input type="checkbox"/> F. CONTAMINATION OF SOIL	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION			
(Acres)			
SWMU 1 has moderate potential for release to soils, due to lack of secondary containment. AOCs 1 & 2 have a moderate potential for release to soil fact that they are underground storage tanks with no continuous monitoring system installed. All other units have low potential.			

01 <input type="checkbox"/> G. DRINKING WATER CONTAMINATION	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION			
None identified. Elk Grove Village obtains its drinking water from Lake Michigan.			

01 <input type="checkbox"/> H. WORKER EXPOSURE/INJURY	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION			
Low potential for worker exposure/injury. All hazardous substances are managed in compliance with RCRA regulations.			

01 <input type="checkbox"/> I. POPULATION EXPOSURE/INJURY	02 <input type="checkbox"/> OBSERVED (DATE: _____)	<input checked="" type="checkbox"/> POTENTIAL	<input type="checkbox"/> ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION			
Low potential for population exposure/injury. All operation are located inside a building that is locked outside business hours; the hazardous waste storage area is also locked after hours.			



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND
INCIDENTS

I. IDENTIFICATION

01 STATE IL 02 SITE NUMBER
ILD 005 087 812

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ K. DAMAGE TO FAUNA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

None identified.

01 ☐ L. CONTAMINATION OF FOOD CHAIN

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ N. DAMAGE TO OFF-SITE PROPERTY

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPS ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

None identified.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

None identified.

III. TOTAL POPULATION POTENTIALLY AFFECTED: > 35,000

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references; e.g., state files, sample analysis, reports)

Visual Site Inspection, April 11, 1991.

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Acme Finishing Co., Inc.
1595 Oakton Street
Elk Grove Village, IL

Date: April 11, 1991

Facility Representatives: Dennis Walters, Vice President

Inspection Team: William Dytrych, RAI
Ramona Reints, RAI

Photographer: William Dytrych

Weather Conditions: Partly cloudy, 45°F, NW Wind approximately 15 mph.

Summary of Activities: RAI conducted a VSI at the facility. The VSI consisted of walking through the area, observing current and past waste disposal areas. Interviews with plant personnel also were conducted. The waste streams generated at the facility are properly managed and no problems were observed.



Photograph No. 1

Orientation: East

Description: Inlets for product paint solvents stored in underground tanks inside building. Inlets are capped and locked. Note whitish staining on wall. Partial view shown of the vent for each storage tank. Writing paper tablet shown for scale.

Location: AOC 1

Date: 04/11/91



Photograph No. 2

Orientation: West

Description: Entrance to outdoor drum storage area. Note posted signs. Area is secured.

Location: SWMU 1

Date: 04/11/91



Photograph No. 3

Orientation: West Northwest

Description: Drums of product parts cleaner inside north fence of outside drum storage area.

Location: SWMU 1

Date: 04/11/91



Photograph No. 4

Orientation: East Southeast

Description: Drums of product paint used as needed in operations.

Location: SWMU 1

Date: 04/11/91



Photograph No. 5

Orientation: Southwest

Description: Black drums in foreground contain product paint used in operations. Center background shows empty overpacks stacked three high.

Location: SWMU 1

Date: 04/11/91



Photograph No. 6

Orientation: West

Description: 10 drums of hazardous waste, labelled and segregated inside west fence of drum storage area, containing paint solvent & TCE still bottoms and waste KOH. No secondary containment.

Location: SWMU 1

Date: 04/11/91



Photograph No. 7

Orientation: Down

Description: Close-up view of asphalt flooring in front of hazardous waste drums. In spite of evidence of wear, integrity intact.

Location: SWMU 1

Date: 04/11/91



Photograph No. 8

Orientation: East

Description: General view of condition of drum storage pavement showing pits and cracks.

Location: SWMU 1

Date: 04/11/91



Photograph No. 9

Orientation: West Northwest

Description: Special waste dumpster (lined with plastic) and general waste dumpster on west edge of parking lot.

Location: SWMU 2

Date: 04/11/91



Photograph No. 10

Orientation: East Northeast

Description: Burn-off Oven used to incinerate volatiles and paint resins in paint accumulated on racks and gathered from spray booths.

Location: SWMU 3

Date: 04/11/91



Photograph No. 11

Orientation: Southwest

Description: Solution of monoethanolamine/diethanolamine used to remove coatings on aluminum parts (lower right-hand side). Gas-fired TCE degreaser tank (left-hand side) segregated from sewer system.

Location: SWMU 6

Date: 04/11/91



Photograph No. 12

Orientation: North

Description: Facility sump pit collects process wastewater and pumps it into first of two in-series treatment tanks. Continuous pH monitoring can trigger injection of sulfuric acid to neutralize alkalinity, followed by discharge to municipal sewer system.

Location: SWMU 4

Date: 04/11/91

ATTACHMENT C

VISUAL SITE INSPECTION FIELD NOTES

4/11/91

Home Finishing Co., Inc.
1595 Oakton Street
Elk Grove Village, IL 60007
ILD CD5 087 812

RCRA Facility Assessment: Visual
Site Inspection.

8:45A Resource Applications, Inc
personnel: (William Detrych;
Ramona Reints) arrived at
site. Acme: Dennis Walters

Weather: Partly cloudy, ~45°F
NW wind ~15 mph.

Oakton is a 4-lane (2 east-
bound, 2 west bound) street.
Acme is on the south side.
Property to the east is a
Hotel 6, to the west

an empty lot, belonging to a Muskegon farm. Halo Lighting, a manufacturing concern, that is Acme's largest account, is to the south. In fact, the 2 facilities are directly connected. To the north, across Oakton, is a Highway Victor Lodge, and a small office complex. Thus, land use in the area is predominantly light industry.

Acme has been in business for nearly 60 years. This is their most recent facility at which they began operations on 8/9/76 after moving from Rosemont. Some years prior to their arrival, McGraw Edison purchased a 50-acre tract at farmland which included the Acme site. Halo Lighting, an operating light plant, Edison, set up their facilities for long after this purchase. After

a number of years and the urging of Halo Lighting, Acme moved to its present location in 1976.

Acme provides extensive finishing service for manufacturers of diversified metal products. Starting materials are pre fabricated metal parts of mostly steel and aluminum. Aluminum being the primary materials and many medium materials have also been treated. Paint coatings are applied to these parts and then baked on. The coatings include: light and low solid solvent based paints; water-based paints; and, dry powder coatings electrostatically applied.

Past and present wastes have included:

(i) paint wastes — ^{principal} ~~principles~~
colors are white, black and grey.
Have used some red, orange
and yellow tints which con-
tain lead. Currently, are re-
questing all paints be Pb-free.

(ii) paint thinners — high-solid
paints are 60-70% solids,
and must be thinned for
some applications. 3 types
of thinners:

(a) toluene (toluol) is not used
anymore.

(b) xylene

(c) naphtha — principal in-
gredient of Ensol 150.

ATTACHMENT D
PROCESS FLOW DIAGRAM

LEGEND FOR PROCESS FLOW DIAGRAM

PROCESS IDENTIFICATION NUMBER;

WASTE SYMBOLS AND SYMBOL CODES;

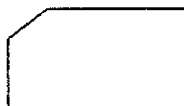
NON-HAZARDOUS & SPECIAL WASTES-



NON-HAZARDOUS WASTES



WASTEWATER



PAINT-COATED FIBERGLASS FILTERS,
PAPER, CARDBOARD AND PLASTIC;
SLUDGE FROM SPRAY BOOTHS



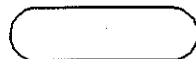
WASHER SLUDGE
AND WASTEWATER TREATMENT SLUDGE



SKIM OIL SLUDGE (FROM WASHER)



OVEN ASH (FROM BURN-OFF OVEN)



EXCESS POWDER PAINT
(SOLIDIFIED BEFORE DISPOSAL)



BAKED DRY PAINT

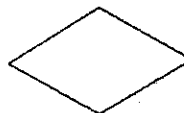
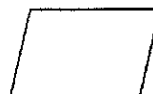
HAZARDOUS WASTES



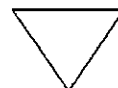
PAINT-CONTAMINATED SOLVENTS



PAINT SOLVENT STILL BOTTOMS



DIRTY TRICHLOROETHYLENE



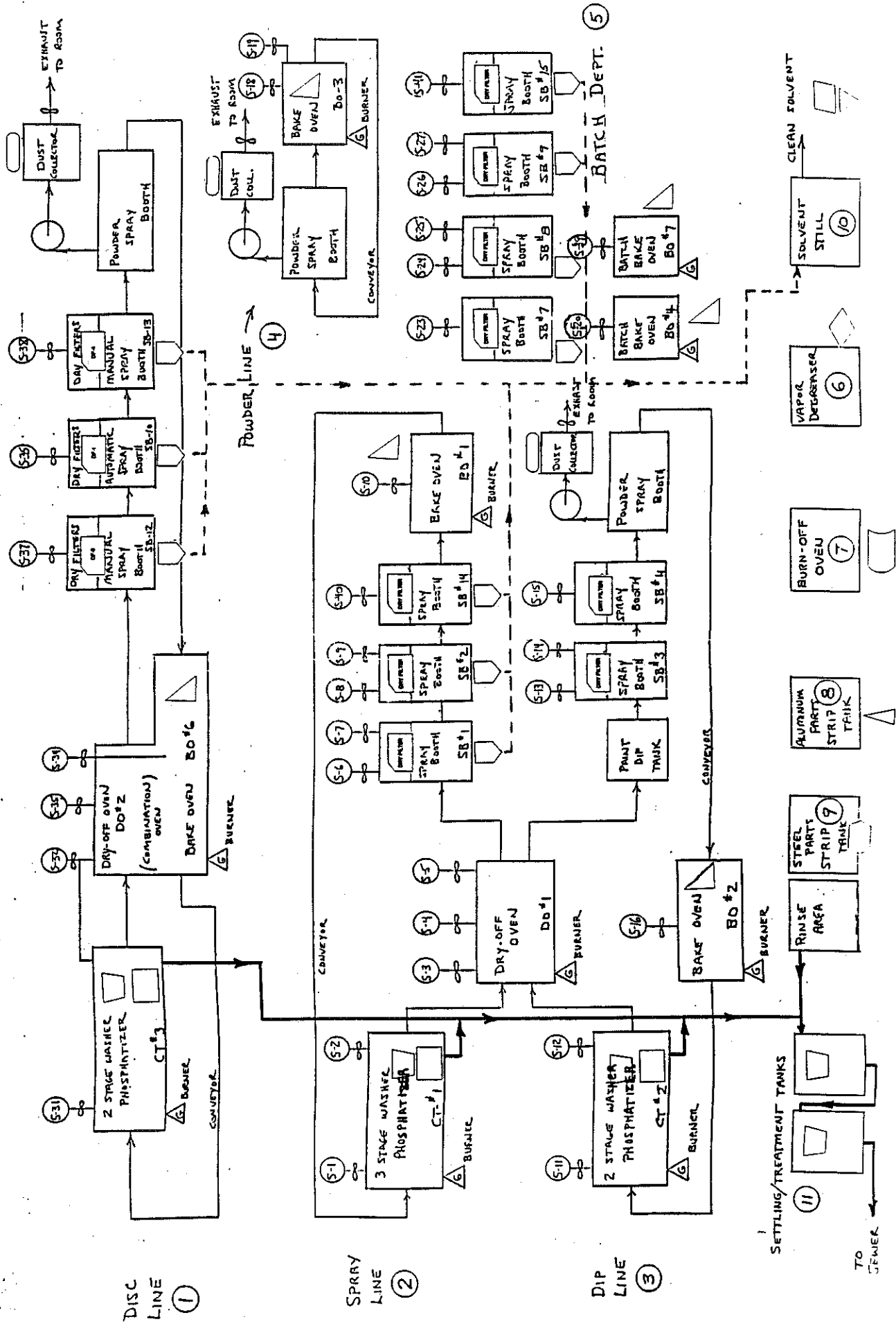
TRICHLOROETHYLENE
STILL BOTTOMS



WASTE POTASSIUM HYDROXIDE



WASTE DEA/MEA



Facility Name ACME FINISHING CO. INC.
Location (City, State) ELK GROVE VILLAGE, IL.
EPA I.D.# ILD 005087812
Reviewer Name STEPHENSON
Date of Review 3/17/86

SUMMARY OF FACILITY CERTIFICATION
REGARDING POTENTIAL RELEASES
FROM SOLID WASTE MANAGEMENT UNITS

- (1) Are there any solid waste management units?

Yes X No _____ Undetermined _____

- (2) If answer to (1) is Yes, list the units by type, number and operating status. If answer to (1) is No or undetermined, go to Question (5).

	<u>Type of Unit</u>	<u>Status</u>
a.	<u>CONTAINER STORAGE AREA</u>	<u>ACTIVE</u>
b.	<u>WASTEWATER TREATMENT UNITS</u>	<u>ACTIVE</u>
c.	_____	_____
d.	_____	_____
e.	_____	_____
f.	_____	_____
g.	_____	_____
h.	_____	_____
i.	_____	_____
j.	_____	_____

- (3) For each type of unit listed in (2), summarize the types and volumes of wastes handled.

	<u>Type of Unit</u>	<u>Type of Waste</u>	<u>Volume of Wastes</u>
a.	<u>CONTAINER STORAGE</u>	<u>EXCESS PAINT N.O.S. AND "THOSE</u>	
b.	<u>WASTEWATER TREATMENT UNITS</u>	<u>LISTED ON OUR PART A APPLICATION."</u>	
c.	_____	_____	_____
d.	_____	_____	_____
e.	_____	_____	_____
f.	_____	_____	_____
g.	_____	_____	_____
h.	_____	_____	_____
i.	_____	_____	_____
j.	_____	_____	_____

- (4) Summarize all releases of hazardous waste or constituents, and check box as to whether company claims it was fully corrected.

	<u>Releases</u>	<u>Corrected?</u>		
a.	<u>NONE</u>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
b.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
c.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
d.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
e.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
f.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
g.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
h.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
i.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>
j.		Yes <input type="checkbox"/>	No <input type="checkbox"/>	Undetermined <input type="checkbox"/>

(5) Certification: Yes ☒ No ☐

(6) Is additional information necessary? Yes ☒ No ☐

(7) Comments: ADDITIONAL INFORMATION REGARDING THE TYPES OF
WASTE MANAGED AT THIS FACILITY IS NEEDED.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

[Handwritten signature]

FACILITY NAME: ACME FINISHING CO. INC.
EPA I.D. NUMBER: ILD005087812
LOCATION CITY: 1595 OAKTON, ELK GROVE VILLAGE
STATE: ILLINOIS, 60007

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	_____	<u>✓</u>
• Surface Impoundment	_____	<u>✓</u>
• Land Farm	_____	<u>✓</u>
• Waste Pile	_____	<u>✓</u>
• Incinerator	_____	<u>✓</u>
• Storage Tank (Above Ground)	_____	<u>✓</u>
• Storage Tank (Underground)	_____	<u>✓</u>
• Container Storage Area	<u>✓</u>	_____
• Injection Wells	_____	<u>✓</u>
• Wastewater Treatment Units	<u>✓</u>	_____
• Transfer Stations	_____	<u>✓</u>
• Waste Recycling Operations	_____	<u>✓</u>
• Waste Treatment, Detoxification	_____	<u>✓</u>
• Other _____	_____	<u>✓</u>

RECEIVED

JAN 30 1986

SWD - AIS
U.S. EPA, REGION V

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

WE HAD ONLY ONE OTHER WASTE, OTHER THAN THOSE

LISTED IN OUR PART "A" APPLICATION, IT WAS:

"EXCESS PAINT N.O.S. NA/263" (OBSOLETE PAINT) - HAZARDOUS
SHIPPED OUT ON 10/4/84 AND 10/9/84 AND BURNED AS A
SECONDARY FUEL SOURCE (FLAMMABLE) - SEE ENCLOSED MANIFESTS

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

DENNIS WALTERS, VICE-PRES.

Typed Name and Title

Dennis Walters

Signature

1-20-86

Date



Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD005087812		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law, but is required by Illinois law.							
3. Generator's Name and Mailing Address ACME FINISHING CO INC. 1595 OAKTON, ELK GROVE VILLAGE, IL 60007						A. Illinois Manifest Document Number IL 1126190									
4. Generator's Phone (312) 640-7890						B. Illinois Generator's ID 0314400002									
5. Transporter 1 Company Name DOMBROWSKI & HOLMES, INC.						C. Illinois Transporter's ID 0057									
6. US EPA ID Number ILD056622457						D. (312) 778-1400 Transporter's Phone									
7. Transporter 2 Company Name						E. Illinois Transporter's ID 0057									
8. US EPA ID Number						F. () Transporter's Phone									
9. Designated Facility Name and Site Address EWR, INC. PO BOX 160 COAL CITY, IL 60416						G. Illinois Facility's ID 0630200003									
10. US EPA ID Number ILD087157251						H. Facility's Phone (815) 631-2211									
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		I. Waste No.			
a. HM X EXCESS PAINT N.O.S. NA 1263						001 TT		01375		1		EPA HW Number 01001 Authorization Number 940830			
b.												EPA HW Number Authorization Number			
c.												EPA HW Number Authorization Number			
d.												EPA HW Number Authorization Number			
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above									
15. Special Handling Instructions and Additional Information															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.															
Printed/Typed Name DENNIS WALTERS						Signature Dennis Walters						Date Month Day Year 10 9 84			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name HANK URBANSKI						Signature Hank Urbanski		Date Month Day Year 10 9 84	
18. Transporter 2 Acknowledgement or Receipt of Materials						Printed/Typed Name						Signature		Date Month Day Year	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name R Hanson						Signature R Hanson						Date Month Day Year 10 9 84			

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5 GENERATOR COPY - PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1963, Chapter 111 1/2 Section 24, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.



Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILDO 05087812	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address ACME FINISHING CO. INC. 1595 OAKTON. ELK GROVE VILLAGE, IL 60007				A. Illinois Manifest Document Number IL 1126189		
4. Generator's Phone (312) 640-7890				B. Illinois Generator's ID 10131141401010012		
5. Transporter 1 Company Name DOMBROWSKI & HOLMES INC				C. Illinois Transporter's ID 112778-1400		
6. US EPA ID Number ILDO 56622657				D. Transporter's Phone 112778-1400		
7. Transporter 2 Company Name				E. Illinois Transporter's ID		
8. US EPA ID Number				F. Transporter's Phone		
9. Designated Facility Name and Site Address EWR INC P.O. BOX 160 COAL CITY, IL. 60416				G. Illinois Facility's ID 06130120100013		
10. US EPA ID Number ILDO 87157251				H. Facility's Phone 815) 634-2211		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.	
a. HM X EXCESS PAINT N.O.S. NA 1263		001	TT	02.145	EPA HW Number 10001 Authorization Number 940830	
b.					EPA HW Number Authorization Number	
c.					EPA HW Number Authorization Number	
d.					EPA HW Number Authorization Number	
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, according to applicable regulations.						
Printed/Typed Name DENNIS WALTERS				Signature Dennis W Walters		
17. Transporter 1 Acknowledgement of Receipt of Materials				Date Month Day Year 10 4 84		
Printed/Typed Name DONALD EMERY				Signature Donald Emery		
18. Transporter 2 Acknowledgement of Receipt of Materials				Date Month Day Year 10 4 84		
Printed/Typed Name				Signature		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name R HANSON				Signature R Hanson		
				Date Month Day Year 10 4 84		

IN ILLINOIS: 217 / 782-3637

24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. # 5

This Agency is authorized to require, pursuant to Illinois Revised Statutes, 1983, Chapter 111½, Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.



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ENCLOSURE 2

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